

INTERIM REPORT
on
MEASURING AND TEST EQUIPMENT RECALIBRATED AT VENDOR FACILITIES

San Onofre Nuclear Generating Station, Units 2 and 3

INTRODUCTION

This interim report is submitted pursuant to 10CFR50.55(e)(3). It describes a deficiency relating to the lack of "as received" documentation for some measuring and testing equipment recalibrated at vendor facilities and utilized at San Onofre Units 2 and 3. This interim report includes a description of the deficiency, the immediate corrective action taken and a description of the ongoing program to determine the nature and extent of work which was accepted utilizing measuring and test equipment which may have been out of calibration.

BACKGROUND

By letter dated November 14, 1979, Edison confirmed notification to the NRC of a deficiency relating to the lack of "as received" documentation for some measuring and test equipment recalibrated at vendor facilities. This condition was discovered during a Quality Assurance audit by Bechtel Power Corporation (Bechtel) during February 1979. Bechtel contracts to various vendors, calibration services for some measuring and test equipment which is utilized by Bechtel Quality Control for the inspection and acceptance of safety related work, the fire protection system and ASME Section III items. Prior to February 1979, some vendors did not document nor notify Bechtel of the "as received" condition for measuring and test equipment which was being recalibrated. Since this equipment may have been out of calibration, appropriate evaluations and documentation of the validity of previous inspections and tests results and the acceptability of items previously inspected and tested were not accomplished.

DISCUSSION

The following is responsive to 10CFR50.55(e)(3).

Description of the Deficiency

Prior to February 1979, when measuring and test equipment was recalibrated at vendor facilities, some vendors did not maintain records of equipment performance at the time of receipt nor did they transmit to Bechtel any performance data reflecting the condition of equipment calibration at receipt. Consequently, the evaluation and documentation of the validity and acceptability of construction work that was accepted by Quality Control Engineering utilizing measuring and test equipment that may have been out of calibration was not accomplished.

Analysis of Safety Implications

The nature and extent of construction activities which have been inspected and accepted by Bechtel Quality Control utilizing measuring and test equipment that may have been out of calibration is continuing to be investigated and evaluated. Consequently, the significance of the safety implications will be discussed in the final report on this subject.

Corrective Action

A lack of clarity in Bechtel procedures resulted in a failure of Bechtel to specify that vendors document the "as received" condition of measuring and test equipment to be recalibrated. These procedures have been revised to provide specific instructions and strengthen control of vendors performing calibration services. These instructions which are attached to the purchase order require the calibration vendor to provide the calibration results of both the "as received" condition and following any adjustment or repair condition. These provisions will be verified as part of the yearly Survey/Audit of calibration vendors.

In addition a program to determine the nature and extent of work which was accepted utilizing measuring and test equipment which may have been out of calibration is underway. This program consists of the following:

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- (1) Identification of all measuring and test equipment which was utilized by Bechtel Quality Control for acceptance of work.
- (2) Compilation of equipment usage data and calibration history of specific equipment for each discipline.
- (3) Preparation of Nonconformance Reports (NCR) for all work which was accepted by Bechtel Quality Control utilizing measuring and test equipment whose calibration in the "as received" condition was out of tolerance or undeterminable. The NCR's will be used to appropriately disposition all affected work.

In conclusion, appropriate procedures have been revised to preclude a further deficiency of this type. A program is underway to determine the nature, extent and significance of this deficiency as it relates to Quality Control acceptance of work and to document and appropriately disposition all affected work. These areas will be discussed in a final report to be submitted on this subject at a later date.