

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8410110027 DOC. DATE: 84/10/03 NOTARIZED: NO DOCKET #
 FACIL: 50-000 Generic Docket 05000000
 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Power 05000324
 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Power 05000325
 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S. R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Provides clarification of QA program requirements for
 measuring & test equipment vs installed process
 instrumentation. Requests NRC concurrence per 10CFR50.54(3)
 by 841031.

DISTRIBUTION CODE: 8001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

NOTES: 05000261
 OL: 07/31/70
 05000324
 OL: 12/27/74
 05000325
 OL: 07/09/76

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
NRR/DL/ADOR	1	NRR/DL/ADL	1
NRR ORB1 BC	1	NRR ORB2 BC	1
NRR LB3 BC	1	NRR ORB1 LA	1
NRR ORB2 LA	1	NRR LB3 LA	1
REQUA, G 01	1	GROTENHUIS, M 01	1
BUCKLEY, B 01	1		
INTERNAL: ADM/LFMB	1	ELD/HDS1	1
IE FILE	1	IE/DEPER/EPB 36	3
IE/DEPER/IRB 35	1	IE/DQASIP/QAB21	1
NRR ROE, M, L	1	NRR/DE/AEAB	1
NRR/DE/CEB 11	1	NRR/DE/EHEB	1
NRR/DE/EQB 13	2	NRR/DE/GB 28	2
NRR/DE/MEB 18	1	NRR/DE/MTEB 17	1
NRR/DE/SAB 24	1	NRR/DE/SGEB 25	1
NRR/DHFS/HFEB40	1	NRR/DHFS/LQB 32	1
NRR/DHFS/PSRB	1	NRR/DL/SSPB	1
NRR/DSI/AEB 26	1	NRR/DSI/ASB	1
NRR/DSI/CPB 10	1	NRR/DSI/CSB 09	1
NRR/DSI/ICSB 16	1	NRR/DSI/METB 12	1
NRR/DSI/PSB 19	1	NRR/DSI/RAB 22	1
NRR/DSI/RSB 23	1	REG FILE 04	1
RGN2	3	RM/DDAMI/MIB	1
EXTERNAL: ACRS 41	6	BNL (AMDTs ONLY)	1
DMB/DSS (AMDTs)	1	FEMA-REP DIV 39	1
LPDR 03	3	NRC PDR 02	1
NSIC 05	1	NTIS	1

TOTAL NUMBER OF COPIES REQUIRED: LTTR 64 ENCL 51



Carolina Power & Light Company

OCT 03 1984

SERIAL: NLS-84-365

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NO. 1 - DOCKET NO. 50-400

CLARIFICATION OF MEASURING AND TEST EQUIPMENT
VERSUS PROCESS INSTRUMENT CALIBRATION

Dear Mr. Denton:

This letter is to provide clarification of Carolina Power & Light Company's Quality Assurance Program requirements for measuring and test equipment and installed process instrumentation and to request NRC concurrence per 10 CFR 50.54(3).

IEEE Standard 498-1975 defines measuring and test equipment (MT&E) as follows:

Devices or systems used to calibrate, measure, gauge, test, inspect, or control in order to acquire research, development, test, or operational data to determine compliance with design, specifications, or other technical requirements. MT&E does not include permanently installed operating equipment or test equipment used for preliminary checks where accuracy is not required; for example, circuit checking multimeters.

There is a key distinction between installed process instruments and measuring and test equipment. A piece of measuring and test equipment may be used to calibrate a number of plant instruments. Thus, a calibration error could affect a wide variety of plant equipment. Process instruments, on the other hand, perform a single function and may be used to operate equipment, verify operability of equipment, or perform a single monitoring or trip function. In the case of measuring and test equipment, the key concern when a device is out of calibration is to identify other instruments to which this inaccuracy has been transferred and, secondly, to prevent recurrence. In the case of process instruments, the key emphasis is to prevent recurrence of the out-of-calibration condition.

8410110027 841003
PDR ADOCK 05000261
PDR

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Boo!
1/0

In ANSI N18.7-1976 (and other documents), the distinction between measuring and test equipment and process instruments is not well defined. The requirements in the second and third paragraphs in Section 5.2.16 will be applied to measuring and test equipment and those in the first and third paragraphs applied to process instruments with the exception that process instrumentation shall be "suitably marked or tracked to indicate calibration status" versus "suitably marked to indicate calibration status." In addition, a review of out-of-calibration process instruments will be made to determine if action is required to prevent recurrence. Such action may include modification, procedural revision, or corrective maintenance.

Per 10 CFR 50.54(3), please issue NRC concurrence with the above clarification by October 31, 1984.

If you should have any questions regarding this information, please contact Steven Laur at (919) 836-6094.

Yours very truly,



S. R. Zimmerman
Manager

Nuclear Licensing Section

SRZ/pgp (454SNP)

cc: Mr. B. C. Buckley (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
Mr. D. O. Myers (NRC-BNP)
Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. M. Grotenhuis (NRC)
NRC Resident Inspector (RNP)
Mr. G. O. Bright (ASLB)
Dr. J. H. Carpenter (ASLB)

Mr. Wells Eddleman
Mr. J. L. Kelley (ASLB)
Mr. Travis Payne (KUDZU)
Mr. Daniel F. Read (CHANGE/ELP)
Mr. John D. Runkle
Dr. Richard D. Wilson
Chapel Hill Public Library
Wake County Public Library