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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

July 28, 1983

Docket Nos. 50-277
50-278

Inspection Report Nos. 50-277/83-10
50-278/83-10

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Our letter of June 10, 1983, forwarded our response to combined Inspection Report 50-277/83-10 and 50-278/83-10 concerning the control of measuring and testing devices used during surveillance testing. Subsequently, the NRC Site Inspector notified us that the reviewer had requested that we provide greater detail in conjunction with the corrective actions described in the original response. Therefore, this revised response is being submitted. Appendix A of the combined Inspection Report addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below along with our revised response.

10 CFR 50, Appendix B, Criterion XII, requires that "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits."

Contrary to the above, on March 25, 1983, the operations section and the test section of the station staff had not established adequate measures to assure that tools, gages, instruments, and other meassuring and testing devices used during surveillance testing (a quality-affecting activity) were properly controlled, calibrated, adjusted in that:

1. No station procedure had been established to administratively control the measuring and testing equipment for which the operations and testing sections were responsible.

2. Traceability of measuring and testing equipment usage was not consistently maintained due to the absence of equipment signout prior to use and to the frequent lack of documentation of the equipment used in the surveillance test procedures. Specific examples of undocumented test equipment use include the following:

   -- The stopwatch used during Surveillance Test (ST) 6.7 performed January 30, 1983, on Unit 2.

   -- The voltmeter used during ST 8.2 performed March 2, 1983, on Unit 2.

   -- The pressure gage used during ST 6.17.1 performed July 26, 1981, on Unit 2.

3. Stopwatches 53-8127 and 53-8240 were stored together and available for use; however, stopwatch 53-8240 was within its calibration due date (May 24, 1983), while stopwatch 53-8217 had exceeded its calibration due date (December 24, 1981).

This is a Severity Level V violation (Supplement I).

Response:

Administrative control of the test equipment used for surveillance testing is being established by revising the administrative procedure governing surveillance tests to require, when the use of test equipment is necessary, the following:

1) that the use of test equipment be documented by recording the instrument serial number and the calibration expiration date on the test;

2) that only test equipment with valid calibrations be used;

3) that test equipment with valid calibrations be kept separate from those that are expired.

This revision will be complete by October 1, 1983.

All surveillance tests performed by the operations personnel and test engineers of the Results Section will be revised to include places to record the instrument serial number and calibration expiration date on the test when the use of test equipment is necessary. These revisions will be complete by June 30, 1984. As an interim measure, the test engineers of the Results Section and operations personnel have been instructed to write in the serial number and calibration expiration date of every piece of test equipment used on each surveillance test performed.

The Results Section has established adequate segregation and traceability by storing test equipment that is within its calibration due date in a separate cabinet and by requiring equipment signout prior to use along with the recording of the test for which the equipment is used.

If any additional information is required, please do not hesitate to contact us.

Very truly yours,

cc: A. R. Blough
Site Inspector