



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-413/85-19

Licensee: Duke Power Company
422 South Church Street
Charlotte, NC 28242

Docket No.: 50-413

License No.: NPF-35

Facility Name: Catawba 1

Inspection Conducted: May 13-17, 1985

Inspector: M. F. Runyan 6/13/85
M. F. Runyan Date Signed

Accompanying Personnel: R. M. Latta, Region II

Approved by: C. M. Upright 6/14/85
C. M. Upright, Section Chief Date Signed
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection involved 68 inspector-hours on site in the areas of procurement; receipt, storage, and handling of equipment and material; surveillance testing and calibration control; and measuring and test equipment (M&TE) program.

Results: No violations or deviations were identified.

8507110030 850618
PDR ADDCK 05000413
Q PDR

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *H. L. Atkins, Project QA Engineer, Mechanical
- *W. F. Beaver, Performance Engineering
- W. H. Bradley, Surveillance Supervisor
- D. Brown, Support Technician
- R. Carpenter, Materials Supervisor
- R. Correll, Materials Supervisor
- *J. W. Cox, Technical Senior Supervisor
- *L. R. Davison, Project QA Manager
- *J. W. Hampton, Site Manager
- C. L. Hartzell, Compliance Engineer
- R. Johnson, I&E Technician
- *R. A. Jones, Performance Engineer
- R. Kaye, Technical Specialist, Maintenance
- *G. L. Keener, QA Surveillance Specialist
- *P. G. Leroy, Licensing Engineer
- D. S. Miller, QA Specialist
- *D. R. Rogers, I&E Engineer
- M. Sahms, Test Supervisor, Performance
- J. Stackley, I&E Support Engineer
- Z. Taylor, Associate Engineer, Test Group, Performance
- J. Teofilak, Junior Engineer, Operations
- W. Truesdale, I&E Supervisor
- *E. G. Williams, Project QA Technician
- J. Williams, Mechanical Maintenance Supervisor
- J. W. Willis, Senior QA Engineer

Other licensee employees contacted included technicians and office personnel.

NRC Resident Inspector

- *P. H. Skinner, Senior Resident

- *Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on May 17, 1985, with those persons indicated in paragraph 1 above. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection. The inspector described the areas inspected and discussed in detail the inspection findings listed below.

Inspector Followup Item: Environmental Controls for Calibration of M&TE in the I&E Shop, paragraph 7.a.

Inspector Followup Item: Promptness of Evaluations of Out-of-Tolerance M&TE, paragraph 7.b.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Procurement (35746, 38701)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
 - (b) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)
 - (c) ANSI N45.2-1971, Quality Assurance Program Requirements for Nuclear Power Plants
 - (d) Regulatory Guide 1.123, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants
 - (e) ANSI N45.2.13-1976, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear power Plants
 - (f) ANSI N18.7-1976, Quality Assurance for the Operational Phase of Nuclear Power Plants
 - (g) Duke Topical Report, Section 17.2, Amendment 8, Operation Quality Assurance
 - (h) Technical Specifications Section 6

Selected elements of the documents listed below were reviewed during this inspection to determine whether the procurement program is being implemented as specified by procedures.

Duke Power Company Policy Statement dated September 19, 1984
 Administrative Policy Manual, Section 2.4, Control of Material, Parts, and Components, Revision 21.
 Administrative Policy Manual, Section 4.5, Administrative Instructions for Purchase Specifications, Revision 21
 PR-301, Specifications, Revision 23
 PR-302, Procurement, Revision 30

PR-303, Procurement of Services, Revision 14
 PR-360, Transfer of Items, Revision 6
 PR-930, Supplier QA Records, Revision 8
 QA-601, Vendor Evaluation, Revision 5
 QA-602, Vendor Surveillance Procedure, Revision 0
 Quality Standard Manual for Structures, Systems, and Components dated
 February 20, 1985
 SD-1.5.1, Administration of the Manual, Revision 5
 SD-2.4.1, Purchase of Materials, Labor, and Services, Revision 12
 SD-2.4.3, Control of Material, Parts, and Components, Original Revision
 SD-2.9.2, Control of Purchased Services, Revision 2
 SD-3.3.1, Determination of Safety-Related or Control Designated
 Structures, Systems, and Components, Revision 2
 SD-4.5.1, Development of Purchase Specifications, Original Revision
 QA-121, Nuclear Regulatory Commission Reporting Requirements,
 Revision 7
 QA-410, Processing of QA Records for Purchased Items, Revision 11
 QA-411, Filing of QA Records for Purchased Items, Revision 11
 QA-601, Vendor Evaluation, Revision 8
 QA-602, Vendor Surveillance Procedure, Revision 8
 QA-605, Vendor QA Releases, Revision 2

The inspector interviewed personnel and examined procurement documents to determine if the licensee and vendors had implemented the above procedural requirements during the initiation, review, approval, and processing of procurement documents. The documents listed below were examined:

Approved Vendors List dated April 1985
 Electrical Engineering Standard Stock List, Revision 1
 Civil Engineering Standard Stock List, Revision 6

<u>Purchase Order No.</u>	<u>Quality Level</u>
J-53338 (Turbine Driven AFW Pump Parts)	1
G-8293 (Radiation Monitor Spares)	2
H-14754 (RCP Internal Parts)	1
J-21378 (Charging Pump Parts)	1
K-39938 (ITT Grinnell 2" Diaphragm Valve Parts)	1
F-32602 (Dragon ½" Instrument Isolation Valve Parts)	2
9969 (Voltage Regulator Indicators)	1
H-14289 (RCP Rotor Shaft Assembly)	1

The following site QA surveillance reports were reviewed to determine the effectiveness of the QA Program for procurement control.

<u>Report Number</u>	<u>Area Inspected</u>
CN-84-14	Issuance Control (Repair of Items for Return to Stock)
CN-84-23	Materials, Parts and Component Control

<u>Report Number</u>	<u>Area Inspected</u>
CN-84-35	Requisitions, POs, and Specifications, (QA Review of Approved Vendors List, Record Control and Retention)
CN-84-40	Inspector Qualifications, Training, and Receipt Inspection
CN-84-62	Issue Control (Administrative)

These surveillance reports appeared complete and documented corrective actions indicate adequate responses from the audited organizations.

In addition to reviewing the referenced site QA surveillances, two recent corporate QA audits were also examined and are listed below:

<u>Report Number</u>	<u>Area Inspected</u>
NP-84-22 (CN)	Operations and Maintenance Activities
NP-85-3 (CQA)	Operations Quality Assurance Program Activities

The referenced QA audits cover a wide range of plant operations; however, they addressed areas of concern to procurement. The pertinent topics concerned maintenance material control and mill test report items. The audit findings of these areas appeared to be complete and the program controls administered were in agreement with the requirements.

Within this area, no violations or deviations were identified.

5. Receipt, Storage, and Handling of Equipment and Materials (35747, 38702)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants
 - (b) 10 CFR 50, Part 2 Reporting of Defects and Noncompliance
 - (c) Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants
 - (d) ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants
 - (e) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)

- (f) ANSI N18.7, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants
- (g) Duke Power Company Topical Report, Quality Assurance Program, DUKE-1-A, Amendment 8, Section 17.2.

The following licensee documents were examined to verify that selected elements of receipt inspections, handling, storage, maintenance, and protection of reactor plant items are being implemented as specified by procedures:

Administrative Policy Section 2.4, Control of Material, Parts, and Components, Revision 21

QCG-1, Receipt, Inspection, and Control of QA Condition Materials, Parts, and Components, Revision 22

QCG-3, Inspection of Items in Storage, Revision 1

QCK-1, Control of Nonconforming Items, Revision 18

MHP-1.5, Confirmation of Purchase Orders, Revision 2

MHP-1.7, Control of Material Transfers, Revision 2

MHP-2.1, Inspection and Control of Stores Stock, Revision 3

MHP-2.3, On Site Certification of Items, Revision 3

MHP-3.1, Storage Methods and Areas, Revision 5

MHP-3.2, Shelf Life Program, Revision 1

MHP-5.1, Issuing and Returning Material, Revision 8

MHP-6.1, Repaired, Salvaged Items, Revision 4

MHP-7.1, Warehouse Temperature and Humidity Measurements, Revision 2

PM/IG-017, Motors in Storage, Revision 3

CNSD-2.4.3 (M), Control of Materials, Parts, and Components, Revision Original

CNSD-2.4.1 (M), Purchasing of Material, Labor, and Services, Revision 12

To verify implementation, the inspector examined procurement documentation associated with five recently processed purchase orders. These POs covered mechanical, electrical, and electronic items. This examination verified that procurement documentation had been prepared as required by licensee procedures, quality release forms had been prepared, vendors were approved, certificates of compliance had been submitted, receiving inspections had been performed, and parts were identified and stored as specified in the reference procedures. The following purchase order packages were selected at random and examined:

<u>Purchase Order Number</u>	<u>Quality Level</u>
K-12534 (Delaval Relief Valve)	1
J-48474 (Westinghouse Switch)	1
K-07724 (Solid State Controls, Volt Meter)	1
J-30001 (American Airfilter, Element)	2
K-08543 (Dixie Bearings, Grease)	1

These safety-related items which had limited shelf life controls were also examined in the material control storeroom to verify that they were maintained in accordance with administrative controls. The following PO packages correspond to the selected items:

<u>Purchase Order Number</u>	<u>Quality Level</u>
K-06592 (ITT Barton, O-Rings)	1
K-06120 (Prespray Corp., Seal)	1
M-14064 (Foam Semkits, RTV Silicone)	3

The inspector performed a physical inspection of the storeroom to observe and verify the location of equipment, tagging and identification practices, housekeeping, segregation of items, and packaging and storage methods. Related discussions with storeroom personnel and observation of work activities revealed that these individuals appeared cognizant of their responsibilities and were performing receiving inspection activities as required by procedures.

Within this area, no violations or deviations were identified.

6. Surveillance Testing and Calibration Control (35745, 61725)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
 - (b) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Revision 2

(c) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

(d) Technical Specifications, Section 4

The documents listed below were reviewed to determine whether selected elements of the surveillance testing and calibration control program are being implemented as specified by procedures.

APM, Section 3.2, Testing, Revision 21
 Quality Control Procedures Manual
 QC K-1, Control of Nonconforming Items, Revision 18
 QC L-5, Control of Preservice and Inservice Inspection Activities, Revision 6
 SD 3.2.1, Development and Conduct of the Preoperational Testing Program, Revision 4
 SD 3.2.2, Development and Conduct of the Periodic Testing Program, Revision 8
 SD 4.2.1, Development, Approval, and Use of Station Procedures, Revision 16

The following site QA surveillance reports were reviewed to gain a perspective of the program's current status:

CN-84-36, Station Testing, Operations Testing, August 14, 1984
 CN-84-42, Station Testing, Performance Testing, August 20, 1984
 CN-84-45, Station Testing, Chemistry Testing, September 14, 1984
 CN-84-47, Station Testing, I&E Periodic Testing, October 1, 1984
 CN-85-02, Station Testing, Maintenance, Health Physics Periodic Testing, January 17, 1985
 CN-85-10, Station Testing, Operations Testing, February 26, 1985
 CN-85-13, Station Testing, Performance Testing, March 26, 1985

Deficiencies identified in these reports included incorrect scheduling dates on the master schedule, incorrect documentation of the necessity to delete steps in a procedure, problems with procedure changes, and incomplete documentation of certain procedure steps. These problems are apparently circumstantial in nature rather than programmatic or systematic and are being corrected in an expeditious manner.

Corporate QA audits address many areas within specific plant groups. The following audits contained inspection of at least some aspect of the surveillance testing and calibration program:

NP-84-2 (CN), Administrative Services and Maintenance, February 20, 1984
 NP-84-9 (CN), Operations and Technical Services Activities, June 11, 1984

NP-84-17 (CN), Technical Services and Administrative Services
Activities, October 30, 1984

NP-84-22 (CN), Operations and Maintenance Activities, December 19, 1984

NP-85-2 (CN), Administrative Services and Maintenance Activities,
February 12, 1985

The most significant program error identified in these audits was a surveillance test data base discrepancy resulting from a recent system conversion. This has been corrected and the licensee is making satisfactory progress in closing other audit findings.

The computerized surveillance test schedule provides a complete status for each required test including procedure number, responsible group, test frequency, next scheduled date, latest permissible date, and previous performance dates. Though this is used as a scheduling device for the Instrument and Electric (I&E) and Maintenance groups, other groups such as Operations and Performance use an independent internal system. Each group is ultimately responsible for ensuring that their assigned tests are completed in accordance with the Technical Specifications (TS). The test group within performance has secondary responsibility in this area on a plant-wide basis.

The completeness and accuracy of the surveillance test data base is essential to the proper execution of the program. The following twenty TS requirements were chosen at random to verify that each test has been scheduled in accordance with the TS:

<u>TS</u>	<u>Test Description</u>	<u>Frequency</u>
4.1.1.2.2	Reactor Water Makeup Pump Operability	18 months
4.1.2.4.2	Charging Pumps Demonstrated Inoperable Tc <285°	1 month
4.2.1.4	Target Flux Difference Update	31 EFPD
4.2.3.3	Reactor Coolant System Flow Rate	12 hours
Table 4.3-1 (8)	Overpower ΔT Analog Channel Operational Test	1 month
Table 4.3-1 (10)	Pressurizer Pressure - High, Channel Calibration	18 months
4.4.3.2	Pressurizer Heater Capacity	3 months
4.4.4.1	Power Operated Relief Valve Operability	18 months
4.5.2.b	Verify ECCS Piping Full	1 month
4.5.4	Refueling Water Storage Tank Operability	7 days
4.6.1.3.c	Containment Air Lock Operability	6 months
4.6.5.8.b	Refueling Canal Drain Operability	3 months
4.7.1.2.1	Auxiliary Feed Pump Operability	1 month
4.7.1.2.2	Auxiliary Feed Flow Path to Steam Generator in Cold Shutdown	1 month
4.8.1.1.1	Circuit Check Between Offsite and Auxiliary Power Systems	7 days

4.8.3.2	AC Buses Energized Properly	7 days
4.9.4.2.a	Reactor Building Containment Purge System Operability	1 month
4.11.1.2	Liquid Effluent Dose Calculation	1 month
4.11.2.4.1	Gaseous Effluent Dose Calculation	1 month
4.12.2	Land Use Census	1 year

Each of the above tests were scheduled at the correct frequency. Information provided by the data base indicated that the tests were being performed at these frequencies and in accordance with TS restrictions concerning interval extensions.

The licensee is required to establish a calibration program for in-plant process instruments associated with safety-related systems but which are not specified in the TS as requiring calibration. The licensee's calibration program was recently cited by the resident inspector for several deficiencies including the failure to evaluate previous test results measured from an instrument subsequently found out of calibration. The following plant instruments were selected at random from several surveillance test procedures to ensure their inclusion in the calibration program:

INDPG 5041	Residual Heat Removal Pump Discharge Flow
INDPG 5060	Residual Heat Removal Pump Discharge Temperature
INIPG 5231	Safety Injection Pump Suction Pressure
INIPG 5310	Safety Injection Pump Discharge Pressure
INSPG 5100	Containment Spray Pump Suction Pressure
INSPG 5080	Containment Spray Pump Discharge Pressure
INSPG 5120	Containment Spray Pump Flow Rate

The above instruments were scheduled for calibration at a specified frequency and were currently calibrated in accordance with this schedule.

The following surveillance test work packages were reviewed as a check of program implementation:

*PT/1/A/4200/10A-02	Residual Heat Removal Pump 1A Performance Test, March 14, 1985
*PT/1/A/4200/05A-00	Safety Injection Pump 1A Performance, January 25, 1985
*PT/1/A/4200/04B-00	Containment Spray Pump A Performance Test, March 8, 1985
IP/1/A/3222/53A-00	Steam Generator A Feedwater Flow, Channel 1, June 15, 1984

IP/1/A/3121/14-00

Pressurizer Power-Operated Relief Valve
Calibration, September 6, 1984

PT/1/A/4150/13B-00

Calorimetric Reactor Coolant Flow Measurement,
April 5, 1985

The above work packages were complete, performed to the latest procedure revision, properly reviewed, and consistent with procedural acceptance criteria. Those marked with an asterisk are included in the inservice inspection (ISI) of pumps and valves as required by ASME Code Section XI, Subsections IWP and IWV, and by Section 4.0.5 of the TS.

Within this area, no violations or deviations were identified.

7. Measuring and Test Equipment Program (35750, 61724)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
 - (b) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Revision 2
 - (c) ANSI N18.7-1976, Administrative Controls and Quality Assurance of the Operational Phase of Nuclear Power Plants
 - (d) Regulatory Guide 1.30, Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment, August 11, 1972
 - (e) ANSI N45.2.4-1972, IEEE Standard, Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generating Stations

The documents listed below were reviewed to verify that selected elements of the measuring and test equipment program are being implemented as specified by procedures.

FSAR, Section 17.2.12, Control of Measuring and Test Equipment,
Amendment 8

APM, Section 2.3, Control of Measuring and Test Equipment, Revision 21

APM, Section 5.1, Standards Laboratory, Revision 21

Quality Control Procedures Manual, Section QC B-1, Control of
Measuring Equipment and Calibration and Test Standards, Revision 20

SD 2.3.1, Control of Measuring and Test Equipment, Revision 7

The following site QA surveillance reports were reviewed to gain a perspective of the program's current status:

CN-84-18, M&TE, I&E Maintenance, May 21, 1984
 CN-84-41, M&TE, Chemistry, August 21, 1984
 CN-84-46, M&TE, Mechanical Maintenance, August 31, 1984
 CN-84-64, M&TE, Performance, November 28, 1984
 CN-85-03, M&TE, I&E Section, February 5, 1985
 CN-85-16, M&TE, Mechanical Maintenance, April 12, 1985

Deficiencies identified in these reports included lack of traceability of a device to a work request, rejected items not tagged, equipment not calibrated at the specified frequency, and M&TE in temporary storage areas not adequately segregated from uncontrolled equipment. These items are closed or are being corrected in an expeditious manner.

Several recent QA corporate audits addressed the subject of measuring and test equipment controlled by various groups. The following audits were reviewed:

NP-84-2(CN), Administrative Services and Maintenance, February 20, 1984
 NP-84-9(CN), Operations and Technical Services Activities, June 11, 1984
 NP-84-17(CN), Technical Services and Administrative Services Activities, October 30, 1984
 NP-84-22(CN), Operations and Maintenance Activities, December 19, 1984
 NP-84-2(CN), Administrative Services and Maintenance Activities, February 12, 1985

Audit NP-85-2(CN) concluded that the control of M&TE in the Instrument and Electric (I&E) Group was inadequate. Corrective action for this item appears to have been effective. Another major finding, identified in NP-84-2(CN), concerned a failure to control vendor manuals. This deficiency has been corrected.

Implementation of the M&TE control program was assessed in three shops: I&E, Mechanical Maintenance, and Performance. In the I&E shop, the following instruments were chosen at random to check storage, identification, and documentation:

CN1AC 18012	Megohm Meter
CN1AC 18037	RTD Bridge
CN1AC 18063	Digital Multimeter
CN1AC 18077	Digital Multimeter

CN1AC 18242	Bourdon Gage
CN1AC 18364	DC Shunt
CN1AC 18534	Pulse Generator
CN1AC 18601	Digital Thermometer
CN1AC 18619	Digital Multimeter
CN1AC 18643	Resistor

The above equipment was properly stored or checked out and had suitable documentation as to its calibration status and previous usage.

The following calibration procedures were reviewed:

IP/O/B/3860/04	Calibration of Test Gauges, Change 9
IP/O/B/3860/07	Moore 14943 Calibrator, Change 0
IP/O/B/3860/13	Transmation 1040/1040SP PPS Digital Calibrator, Change 1
IP/O/B/3860/11	Rosemont 262 Field Calibrator Calibration, Change 2
IP/O/B/3860/12	Swagelock Gap Inspection Gage, Change 0
IP/O/B/3860/10	Heise 710A Digital Pressure Indicator, Change 2
IP/O/B/3860/01	Fluke 8600A Digital Multimeter Calibration, Change 3

The above procedures addressed test prerequisites, step-by-step instructions, and acceptance criteria with the exception of IP/O/B/3860/01, Fluke 8600A Digital Multimeter Calibration. This procedure failed to state calibration test conditions prescribed by the manufacturer. This issue is discussed as an inspector followup item below.

The mechanical maintenance lab is a well-controlled, clean, orderly facility. Equipment storage is excellent and lab temperature is precisely controlled. The following tools chosen at random were examined:

CNMNT 18009	Torque Wrench
CNMNT 18204	0-1" Micrometer
CNMNT 18402	0-9" Depth Micrometer
CNMNT 18656	0-2" Dial Indicator
CNMNT 18827	Optical Flat

The above tools were properly stored and were supported with suitable documentation. Only torque wrenches, dial indicators, and micrometers are calibrated in this lab. Other mechanical equipment is sent off site for calibration. The following calibration procedures were reviewed:

MP/O/B/7650/43	Calibration of Torque Wrenches, Change 0
MP/O/B/7650/18	Calibration of Dial Indicators 0-1", Change 0
MP/O/B/7650/10	Calibration of Outside Micrometers, Change 0

These procedures appeared adequate to assure the quality of calibration activities.

The Performance Group controls pressure gauges, thermometers, and other devices primarily for the performance of inservice testing of pumps and valves. The following items of M&TE were selected for review:

CNPRF 20010	Fluke Digital Thermometer
CNPRF 20229	0-100 psig Heise Gauge
CNPRF 20255	0-15 psig Ashcroft Gauge
CNPRF 20334	0-100 psig Helicoid Gauge
CNPRF 20431	0-100 psig MRM D/P Gauge

Each of the above items were either properly stored and tagged or equipment history cards indicated that they were checked out.

Within this area, two inspector followup items were identified and are discussed in the following paragraphs.

a. Environmental Controls for Calibration of M&TE in the I&E Shop

Procedure IP/O/B/3860/01, Fluke 8600A Digital Multimeter Calibration, Change 3, does not state the manufacturer's recommended calibration test conditions of 23 ± 5 degrees C and less than 80 percent humidity. These conditions are not verified by documentation on calibration data sheets. The licensee recently identified this problem and is enacting corrective measures. Procedure IP/O/B/3860/01 is under revision to require calibration within the recommended test conditions and to require documentation of temperature and humidity on the calibration data sheet. However, the draft of the revision shown to the inspector did not specifically state the required test conditions which otherwise could only be found by referring to the manufacturer's technical manual. The licensee stated that this matter would be reviewed. A temperature and humidity indicator is on order and calibration activities will soon be moved to a separate room. Though environmental conditions will probably not be controlled in the new facility, they will be monitored to ensure that calibration will take place only when test conditions are met. The licensee was encouraged to review technical information associated with all items of M&TE calibrated on site to ensure that suitable environmental conditions are provided. Until environmental conditions are procedurally and effectively controlled for calibration of M&TE in the I&E shop, this item is identified as Inspector Followup Item 413/85-19-01.

b. Promptness of Evaluations of Out-of-Tolerance M&TE

When an item of M&TE is found out of tolerance, the licensee is required to evaluate the acceptability of previous tests conducted with this item since the last calibration. Though no regulatory requirements prescribe how soon this evaluation must be completed after the

out-of-tolerance condition is discovered, promptness is an essential issue since reactor plant safety may be compromised. The licensee's policy concerning this issue is inconsistent. The Quality Control Procedures Manual requires that evaluations be completed within 7 working days for M&TE assigned to QA. The remainder of the plant's M&TE falls under the control of Station Directive 2.3.1, Control of Measuring and Test Equipment, which states the requirement to perform the evaluations without reference to timeliness. Individual calibration procedures in the Performance Shop state a requirement of 7 days but calibration procedures in I&E and Mechanical Maintenance do not specify a time limit. As a result, some evaluations take two to three weeks and some exceed a month. This is a problem if the licensee has determined that 7 days is the proper priority for these evaluations. Until a consistent plant-wide policy is developed to address the timeliness of M&TE out-of-tolerance evaluations, this item is identified as Inspector Followup Item 413/85-19-02.