

yellow

October 1, 1985

Alabama Power Company
ATTN: Mr. R. P. McDonald
Senior Vice President-Nuclear Generation
P. O. Box 2641
Birmingham, AL 35291

Gentlemen:

SUBJECT: REPORT NOS. 50-348/85-25 AND 50-364/85-25

Thank you for your response of August 16, 1985, to our Notice of Violation issued on July 18, 1985, concerning activities conducted at your Farley facility. With regard to Violation 1, parts b and c, Violation 2, part a, and Violation 4, we have concluded, for the reasons presented in the enclosure to this letter, that the violations occurred as stated in the Notice of Violation. Therefore, in accordance with the requirements of 10 CFR 2.201, and within 30 days of the date of this letter, please resubmit your response to the Notice of Violation.

With regard to Violation 1, part a, we are reviewing this matter further and will respond to this item at a later date.

With regard to Violation 2, part b, we agree with your position and have deleted this part of the violation from our records.

With regard to Violation 3, we have concluded for the reasons presented in the enclosure to this letter that your proposed corrective action to avoid further violations is unacceptable. Therefore, in accordance with the requirements of 10 CFR 2.201, and within 30 days of the date of this notice, please resubmit your response to the Notice of Violation.

With regard to your denial that Violations 1, 2, and 4 are properly designated as Severity Level IV, we have concluded, for the reasons presented in the enclosure to this letter, that the proper severity levels were designated.

We appreciate your cooperation in this matter.

Sincerely,

(Original signed by JNGrace)

J. Nelson Grace
Regional Administrator

Enclosure: (See Page 2)

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PDR ADOCK 05000348
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Enclosure:

Staff Evaluation of Licensee Response
Dated August 16, 1985

- ✓ W. O. Whitt, Executive Vice President
- ✓ J. D. Woodard, Plant Manager
- ✓ W. G. Hairston, III, Manager
Nuclear Engineering and Technical
Support
- ✓ J. W. McGowan, Manager-Safety Audit
and Engineering Review
- ✓ H. O. Thrash, Manager, Nuclear
Operations and Administration
- ✓ W. G. Ware, Supervisor-Safety Audit
and Engineering Review

bcc w/encl:

- ✓ NRC Resident Inspector
- ✓ E. Reeves, Project Manager, NRR
Document Control Desk
State of Alabama

RII

MRUnyan:dr
9/10/85

RII

ABelisle
9/10/85

RII

CJullan
9/11/85

RII

AGibson
09/24/85

RII

FCantrell
09/26/85

RII

RJenkins
09/30/85

RII

RWalker
09/29/85

RII

JOlshinski
09/ /85

ENCLOSURE

STAFF EVALUATION OF LICENSEE RESPONSE
DATED AUGUST 16, 1985

Our assessment of your reasons for denial of the violation is as follows:

1.b. You make the following statement in your denial:

Alabama Power Company does not agree that failure to document evaluations of mechanical test equipment is a violation of the cited requirements, since ANSI N45.2.4-1972 is not applicable to mechanical test equipment. FNP-O-AP-15 does require that an evaluation be performed when mechanical test equipment is found out of tolerance; however, there is no requirement to document this evaluation. We agree that FNP-O-AP-15 can and will be improved by adding and implementing a requirement to document evaluations.

We agree with your statement that ANSI N45.2.4-1972 does not specifically apply to mechanical test equipment. However, you are also committed to Regulatory Guide 1.28 which endorses ANSI N45.2-1971. This standard (Section 13) clearly applies to mechanical equipment and states the same requirement to evaluate previous test results when measuring and test equipment (M&TE) is found out of calibration. You should also note that the citation was for failure to evaluate, not failure to document. Your response addresses only documentation. Additionally, when directly questioned by the inspector, Farley plant personnel stated that evaluations were rarely performed and never documented.

1.c You make the following statement in your denial:

No ANSI standard requires that a time interval be established for performing these evaluations. Alabama Power Company does not consider that lack of formal definition of "promptly" regarding test equipment evaluation is a violation of regulatory requirements. A plant review of all test instruments over the first 5 months of 1985 revealed that the average time for review was 29 days. We concur that an enhancement of the program would be a definition of "promptly" which we will incorporate into our procedures.

We agree that ANSI standards do not prescribe the establishment of a time limit for evaluations. However, it is our position that the safety implications of this issue merit the application of 10 CFR 50, Appendix B, Criterion XVI, and the accepted QA program requiring measures be established to assure that conditions adverse to quality are promptly identified and corrected. Measures do not exist to assure promptness. We do not concur with your implication that completion times have been acceptable.

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You make the following statement in your denial:

Additionally, Alabama Power Company would deny that the alleged violation is properly designated as Severity Level IV.

Failure to perform evaluations, to document those evaluations, and to establish measures to assure conditions adverse to quality are promptly corrected constitutes a failure to meet regulatory requirements that has more than minor safety significance.

In conclusion, it is our position that Violations 1.b and 1.c occurred and that the proper severity level was assigned.

2.a You make the following statement in your denial:

The violation states that measures have not been established to assure that suitable environmental conditions are provided for measuring and test equipment calibration. Adequate measures do exist for providing and controlling environmental conditions in the I&C laboratory; however, these conditions are not verified and recorded prior to calibration of each individual instrument. Moreover, the inspection report does not identify an occurrence where the existing level of administrative controls resulted in improper calibrations. After a detailed review, the inspector indicated on page 11 of the inspection report that the I&C laboratory humidity had remained within the most limiting test instrument calibration environmental condition for almost every day during the past year.

We agree that hardware measures (air conditioning, heater, dehumidifiers, etc.), exist, but the violation was specifically against the failure to provide programmatic measures to assure proper environmental controls. It is evident that a systematic assessment of the environmental sensitivities of shop standards and test equipment has never been accomplished. We did state that test conditions were almost always met for Fluke digital multi-meters, but this was not intended to imply that the same conclusion applies to all other pieces of test equipment you currently own or may purchase in the future.

You make the following statement in your denial:

Additionally, Alabama Power Company would deny that the alleged violation is properly designated as Severity Level IV.

Failure to establish suitably controlled conditions for performing activities affecting quality constitutes a failure to meet regulatory requirements that has more than minor safety significance.

In conclusion, it is our position that Violation 2.a occurred and that the proper severity level was assigned.

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3. You make the following statement regarding steps to avoid further violations:

FNP-O-AP-11 will be revised to document evaluation of calibration interval changes, when such changes are indicated by test equipment being found out of calibration.

Your response states that interval changes will be documented, but does not describe a method of trend or failure analysis to determine when such a change in calibration frequency is warranted. Your current method of historical calibration recordkeeping does not provide the means to perform this analysis.

4. You make the following statement in your denial:

FN-O-AP-11, Section 4.8 states,
"Storage

- 4.8.1 Test equipment will be stored in the Calibration Lab or in such secure locations as the responsible foreman may direct.
- 4.8.2 Storage location environment shall be maintained such that test equipment accuracy to specifications will be maintained.
- 4.8.3 Daily access to test equipment will generally be limited to those personnel assigned to the Calibration Lab for calibration and test equipment checkout activities."

Nothing in the above cited requirement requires any access controls in addition to those which currently exist. The subject measuring and test equipment is physically located for storage in the I&C Calibration Laboratory wherein a check-out log is maintained. The laboratory is an enclosed room, not continuously manned at all times, but opens into the maintenance and storeroom area which is manned 24 hours a day. Additionally, the access to the maintenance and storeroom areas as well as the laboratory itself is in the Owner Controlled Area with access controlled by Central Security Control. Neither 10 CFR 50 Appendix B Criterion XII nor FNP-O-AP-11 Section 4.8 contains any additional requirements for more stringent access control, nor are any warranted.

Our contention is that you have failed to follow your own procedure. Section 4.8.3 of FNP-O-AP-11 states that "daily access to test equipment will generally be limited to those personnel assigned to the calibration lab for calibration and test equipment checkout activities." There was no evidence during the inspection that access was ever restricted for anyone who could gain access to the Owner Controlled Area. The two NRC inspectors walked in and were unnoticed for 10 minutes. There was no evidence that any security was provided by personnel in the maintenance and storeroom areas. Access to the laboratory is actually by a hallway leading to these areas and does not require passage through the maintenance and storeroom area. The security issue is therefore twofold. First, unescorted visitors or

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contractor personnel could tamper with shop standards or test equipment. Second, Farley personnel could use test equipment at any time without ensuring that the usage is properly documented.

You make the following statement in your denial:

Additionally, Alabama Power Company would deny that the alleged violation is properly designated as Severity Level IV.

Failure to provide security for shop standards and positive accountability for test standards constitutes a failure to meet regulatory requirements that has more than minor safety significance.

In conclusion, it is our position that Violation 4 occurred and that the proper severity level was assigned.