

Mailing Address
Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6090

R. P. McDonald
Senior Vice President
Flintridge Building

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August 16, 1985

Docket No. 50-348
Docket No. 50-364

Mr. D. M. Verrelli
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 3100
Atlanta, GA 30323

SUBJECT: J. M. Farley Nuclear Plant NRC Inspection of
June 3 - 7, 1985

RE: Report Numbers 50-348/85-25
50-364/85-25

Dear Mr. Verrelli:

This letter refers to the violations cited in the subject inspection report which states:

"The following violations were identified during an inspection conducted on June 3 - 7, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion XVI, and the accepted QA program require establishing measures to assure that conditions adverse to quality are promptly identified and corrected. The accepted QA program commits to Regulatory Guide 1.30 which endorses ANSI N45.2.4 - 1972, Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generating Stations. Section 2.5.2 of this standard states that an evaluation shall be made concerning the validity of previous tests and acceptability of devices previously tested from the time of the previous calibration when inspection and testing equipment is found out of calibration.

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Contrary to the above, adequate measures have not been established to assure that these evaluations are properly performed. The following examples were identified:

- a. Evaluations were not required or performed when installed process instruments used to verify Technical Specification operability requirements were subsequently found out of tolerance.
- b. Contrary to AP-15, Maintenance Conduct of Operations, Revision 8, Section 7.4, evaluations were not performed when mechanical measuring and test equipment was found out of tolerance.
- c. The timeliness of evaluations performed by the I&C laboratory was not specified and evaluations were not promptly completed. An informal time limit of three weeks was in use at the working level but had not been specifically approved by management and does not provide a prompt assessment of safety significance for measuring and test devices found out of calibration. This informal limit was often exceeded with several evaluations taking about three months to complete.

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

2. 10 CFR 50, Appendix B, Criterion II, and the accepted QA program require that activities affecting quality shall be accomplished under suitably controlled conditions, including suitable environmental conditions for accomplishing the activity.

Contrary to the above, measures have not been established to assure suitable environmental conditions for calibrating measuring and test equipment.

- a. Temperature and humidity indication was provided in the I&C laboratory but not verified or recorded prior to performing environmentally sensitive calibrations. Acceptance standards for laboratory environmental conditions were not established.
- b. In the mechanical shop, calibration activities were performed in ambient conditions at three locations within the shop. Measures were not established to define and provide acceptable environmental conditions for calibration activities.

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

3. 10 CFR 50, Appendix B, Criterion XII, and the accepted QA program collectively require that measures be established to assure that measuring and testing devices are properly calibrated with sufficient frequency to assure that accuracy is maintained. The

accepted QA program commits to Regulatory Guide 1.33 which endorses ANSI N18.7 - 1972, American National Standard for Administrative Controls for Nuclear Power Plants. Section 5.3.6 of this standard requires that procedures be provided for proper control of measuring and test equipment to confirm the adequacy of calibration frequency. Procedure AP-11, Control and Calibration of Test Equipment, Test Instrumentation and Plant Instrumentation, Revision 5, Section 4.6.2.2, requires that equipment data obtained from calibration checks be analyzed to optimize calibration check intervals.

Contrary to the above, adequate measures have not been established to assure that measuring and testing devices are calibrated with sufficient frequency to assure that accuracy is maintained. Historical calibration records are not maintained and analyzed to confirm the adequacy of calibration frequency. As an example, the Keithley Picoampere Source Model 261 was changed from the vendor calibration frequency of three months to six months without documented justification. Subsequently, the device was found out of tolerance at least twice in two years without reassessment of the calibration frequency.

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

4. 10 CFR 50, Appendix B, Criterion XII, and the accepted QA program require that measures be established to assure that measuring and testing devices are properly controlled. Procedure AP-11, Control and Calibration of Test Equipment, Test Instrumentation and Plant Instrumentation, Revision 5, Section 4.8.3, requires 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.

Contrary to the above, adequate measure have not been established to control access in the I&C calibration lab. The lab is routinely left unlocked at all hours, attended only intermittently during normal working hours, and located in an area where visitors may gain unescorted access. Therefore, the licensee does not have positive control over equipment checkout and documentation procedures or the ultimate security of NBS-traceable shop standards which are left unlocked and unattended.

This is a Severity Level IV violation (Supplement I)."

Admission or Denial

1. General Alabama Power Company denies that a violation exists. The bases of denial for each of the examples are as follows:
 - 1a. Alabama Power Company does not consider this to be an example of a violation for the following reason: ANSI N45.2.4 covers installation, inspection and testing requirements for instrumentation and electric equipment. Paragraphs 1.1 and 1.1.1 of this standard define the scope of the standard to be Class 1 and 1E electric power, instrumentation, and control equipment and systems, and auxiliary equipment that are a part thereof, including cables, instrument sensing lines and transducers, primary sensing devices, etc. The remainder of the standard addresses requirements for installing, inspecting, calibrating and testing the above equipment. For instance, paragraph 2.3 requires that procedures and instructions shall be used and shall include identification of test equipment and date of required recalibration where required for interpretation of test results. Paragraph 2.5, entitled, "Measuring and Test Equipment," outlines the requirements for test equipment that is to be used in the above activities. Paragraph 2.5.2 discusses calibration and control for this test equipment. It is clear from reviewing N45.2.4 that plant instrumentation and test equipment are addressed separately, and that the requirements of paragraph 2.5 apply only to test equipment that is used to inspect, calibrate or test Class 1 and 1E plant equipment, including installed instrumentation. Therefore, the requirements for controlling test equipment are distinct from those for installed systems; thus no violation exists.
 - 1b. 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-0-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-0-AP-15 can and will be improved by adding and implementing a requirement to document evaluations.
 - 1c. Alabama Power Company does not consider this to be an example of a violation for the following reason: 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.

Alabama Power Company has utilized its same program, procedures and practices in this area since 1977. This area has been audited by the NRC numerous times. The alledged noncompliance constitutes new interpretations by current NRC officials.

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

2. General Alabama Power Company denies that a violation exists. The bases for each of the examples are as follows:

2a. Alabama Power Company does not agree that this is an example of a violation for the following reason: 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.

2b. Alabama Power Company does not agree that this is an example of a violation for the following reason: A survey of all mechanical devices which require calibration in the machine shop was performed early in plant life and no specific temperature or humidity requirements were identified by the equipment manufacturers. Thus no special environmental controls, other than ambient shop conditions, were established. Following this inspection, the equipment manufacturers were again contacted and they reconfirmed that no special environments are required. In fact, the equipment manufacturers stated that they performed calibrations at ambient shop conditions similar to those in the Farley Nuclear Plant shop area. Therefore, the existing controls are judged to be adequate, and no violation exists.

Alabama Power Company has utilized its same program, procedures and practices in this area since 1977. This area has been audited by the NRC numerous times. The alledged noncompliance constitutes new interpretations by current NRC officials.

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

3. Alabama Power Company admits the violation.
4. Alabama Power Company denies that a violation exists. 10 CFR 50, Appendix B, Criterion XII states,

"1 Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly:

a Controlled.

b Calibrated and adjusted at specified periods to maintain accuracy within necessary limits."

FNP-0-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 it 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 10CFR50 Appendix B Criterion XII nor FNP-0-AP-11 Section 4.8 contains any additional requirements for more stringent access control, nor are any warranted.

Alabama Power Company has utilized its same program, procedures and practices in this area since 1977. This area has been audited by the NRC numerous times. The alledged noncompliance constitutes new interpretations by current NRC officials.

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

Reason for Violation

- 1a. Not Applicable.
- 1b. Not applicable.
- 1c. Not applicable.
- 2a. Not applicable.
- 2b. Not applicable.
- 3. This violation was caused by procedural inadequacy in that although FNP-0-AP-11 does include a requirement for optimizing calibration frequencies, it does not provide specific guidance for implementation.
- 4. Not applicable.

Corrective Action Taken and Results Achieved

- 1a. None required.
- 1b. None required.
- 1c. None required.
- 2a. None required.
- 2b. None required.
- 3. The calibration interval of the Keithley Picoampere Source will be re-evaluated.
- 4. None required.

Corrective Steps Taken to Avoid Further Violations

- 1.a Not applicable.
- 1.b Not applicable. (As a program enhancement, FNP-0-AP-15 will be revised to require documentation of evaluations of mechanical test equipment found to be out of calibration.)
- 1c. Not applicable. (As a program enhancement, an administrative time-frame for evaluating out-of-calibration equipment will be established.)
- 2. Not applicable.

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3. FNP-0-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.
4. Not applicable.

Date of Full Compliance

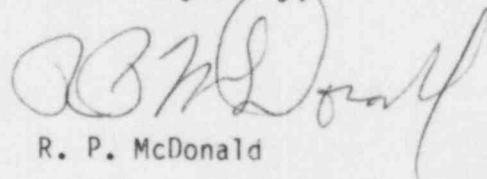
1. Not applicable.
2. Not applicable.
3. 12-1-85
4. Not applicable.

Affirmation

I affirm that this response is true and complete to the best of my knowledge, information and belief.

The information contained in this letter is not considered to be of a proprietary nature.

Yours very truly,

A handwritten signature in cursive script, appearing to read "R. P. McDonald".

R. P. McDonald

RPM:sam

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