



**PECO PowerLabs**<sup>SM</sup>  
Testing and Solutions, Guaranteed.

PECO Energy Company  
175 North Cain Road  
Coatesville, PA 19320

Kenneth Peters  
New York Power Authority  
Indian Point # 3 Nuclear Power Plant  
P.O. Box 315  
Buchanan, NY 10511

May 26, 2000

Subject: 10CFR PART 21.21 (b) Notification

Reference: Telecon: F. Cebular and W.T. Baxter (PECO PowerLabs) to  
R. Burrone (IP3), May 25, 2000

Dear Mr. Peters:

On May 24, 2000 we identified a deviation within our operations regarding the calibration of VOTES (Valve Operation Test & Evaluation System) valve stem deflection system instrumentation. Calibration of the VOTES clamp, performed by a specific technician, was not completed in accordance with prescribed calibration requirements. This calibration process requires that 30 test points be measured through simulated application of load using the calibration fixture. These measurements (coefficient values) represent deflection and provide an indication of proper valve operation (e.g. seating).

The sensitivity of the VOTES clamp is determined by taking an average of the 30 test points. The stations verify valve operability using the calculated sensitivity.

It was established from review of calibration records and discussion with the noted technician that only 10 of 30 test points were measured for as-found data. Therefore the sensitivity of the VOTES probe was based on an average of ten rather than 30 test point readings as required by the calibration format.

The noted technician performed the most recent calibration of the following IP3 VOTES clamps:

IP3 M-1943-0005	Liberty Technology Model No. MCC-100
IP3 M-1943-0004	Liberty Technology Model No. MCC-100
IP3 M-1943-0002	Liberty Technology Model No. ECC-225
IP3 M-1965-0002	Liberty Technology Model No. ECC-225

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PECO PowerLabs has taken immediate action in response to the identified deviation through our corrective action process, and determined the technical acceptability of the calibration performed by the noted technician on the basis of the following:

The technical adequacy of taking 10 readings as opposed to 30 readings was evaluated. The 30 readings provide an increased confidence level, but do not assure greater accuracy. As long as the 10 points taken were within the prescribed tolerance for the subject VOTES clamps, the accuracy of the system is within tolerance. Additional justification that the VOTES clamps are within the prescribed tolerance was provided by re-calibration of a random sample of such clamps previously calibrated by the noted technician.

While we cannot evaluate the impact of this deviation on your operation, the above information is provided for your assistance. Should you desire re-calibration of your equipment, we will provide this service in an expedited fashion at our expense.

As a follow-up to the referenced telecon, a draft copy of this letter was faxed to Rich Burrioni – I&C Manager on 5/25/2000.

Should you have questions in regard to this matter, please contact Frank Cebular, Production Manager, (610) 380-2423 or Tim Baxter, Quality Assurance Manager, (610) 380-2374.

Sincerely,

Handwritten signature of Frank Cebular, with "for QCB" written below it.

George C. Bell  
Director

Copy to:

David Helker  
PECO Nuclear Licensing

H. J. Miller  
USNRC

USNRC  
Document Control Desk



**PECO PowerLabs**<sup>SM</sup>  
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PECO Energy Company  
175 North Caln Road  
Coatesville, PA 19320

George Tasick  
James A. Fitzpatrick Nuclear Plant  
268 Lake Road  
Lycoming, NY 13093

May 26, 2000

Subject: 10CFR PART 21.21 (b) Notification

Telecon: F. Cebular and W.T. Baxter (PECO PowerLabs) to  
Mike Reno (JAF), May 26, 2000

Dear Mr. Tasick;

On May 24, 2000 we identified a deviation within our operations regarding the calibration of VOTES (Valve Operation Test & Evaluation System) valve stem deflection system instrumentation. Calibration of the VOTES clamp, performed by a specific technician, was not completed in accordance with prescribed calibration requirements. This calibration process requires that 30 test points be measured through simulated application of load using the calibration fixture. These measurements (coefficient values) represent deflection and provide an indication of proper valve operation (e.g. seating).

The sensitivity of the VOTES clamp is determined by taking an average of the 30 test points. The stations verify valve operability using the calculated sensitivity.

It was established from review of calibration records and discussion with the noted technician that only 10 of 30 test points were measured for as-found data. Therefore the sensitivity of the VOTES probe was based on an average of ten rather than 30 test point readings required by the calibration format.

The noted technician performed the most recent calibration of the following J.A. Fitzpatrick VOTES clamps:

JAF E-181	Liberty Technology Model No. DCC-100
JAF E-244	Liberty Technology Model No. MUC-100
JAF E-221	Liberty Technology Model No. DCC-100
JAF E-300	Liberty Technology Model No. DCC-350
JAF E-132	Liberty Technology Model No. CCL-100
JAF E-148	Liberty Technology Model No. MCC-100
JAF E-219	Liberty Technology Model No. CCL-100
JAF E-299	Liberty Technology Model No. DCC-350
JAF E-360	Liberty Technology Model No. EMC-125
JAF E-180	Liberty Technology Model No. DCC-100
JAF E-182	Liberty Technology Model No. MUC-100
JAF E- 1058	Liberty Technology Model No. VVC-100
JAF E- 129	Liberty Technology Model No. UCL-100
JAF E-130	Liberty Technology Model No. UCL-100
JAF E-232	Liberty Technology Model No. UCL-100
JAF E-134	Liberty Technology Model No.MCC-100
JAF E-1018	Liberty Technology Model No.CCL-100
JAF E-133	Liberty Technology Model No.SCL-100
JAF E-297	Liberty Technology Model No.ECC-225
JAF E-2023	Liberty Technology Model No.CCL-100
JAF E-2025	Liberty Technology Model No.EMC-125
JAF E-147	Liberty Technology Model No.MUC-100
JAF E-296	Liberty Technology Model No.ECC-225

PECO PowerLabs immediately responded to the identified deviation through our corrective action process, and determined the technical acceptability of the calibration performed by the noted technician on the basis of the following:

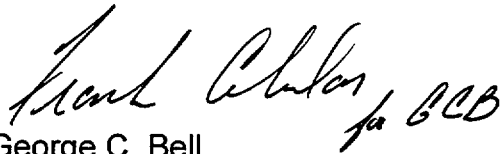
The technical adequacy of taking 10 readings as opposed to 30 readings was evaluated. The 30 readings provide an increased confidence level, but do not assure greater accuracy. As long as the 10 points taken were within the prescribed tolerance for the subject VOTES clamps, the accuracy of the system is within tolerance. Additional justification that the VOTES clamps are within the prescribed tolerance was provided by re-calibration of a random sample of such clamps previously calibrated by the noted technician.

While we cannot evaluate the impact of this deviation on your operation, the above information is provided for your assistance. Should you desire re-calibration of your equipment, we will provide this service in an expedited fashion at our expense.

As a follow-up to the referenced telecon, a draft copy of this letter was faxed to Mike Reno – I&C Manager on 5/26/2000.

Should you have questions in regard to this matter, please contact Frank Cebular, Production Manager, (610) 380-2423 or Tim Baxter, Quality Assurance Manager, (610) 380-2374.

Sincerely,

A handwritten signature in cursive script that reads "Frank Cebular" followed by "for GCB".

George C. Bell  
Director

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David Helker  
PECO Nuclear Licensing

H. J. Miller  
USNRC

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Document Control Desk