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ACCESSION NBR: 8906290522 DOC. DATE: 89/03/10 NOTARIZED: NO DOCKET #
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SUBJECT: Responds to NRC 890210 ltr re violations noted in Insp Rept
 50-263/88-27.

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March 10, 1989

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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to Notice of Violation
Inspection Report No. 50-263/88027 (DPR)

In response to your letter of February 10, 1989, which transmitted Inspection Report No. 263/88027(DPR), the following information is offered.

Violation

Administrative Procedure 4 ACD-6.4, Calibration and Control of Inspection, Measuring and Test Equipment, Revision 5, Step 6.4.2 states: "Either a calibration or calibration verification shall be performed at the scheduled interval or prior to use". Additionally, Step 6.5 states: "M&TE found out of calibration shall be clearly identified with a Defective Tag and be segregated to prevent its use".

Contrary to the above, on December 28, 1988, the NRC Resident inspector observed licensee personnel performing WRA 88-0825 using a torque multiplier (TM-019) tool that was past its calibration due date. The tool had a Defective Tag attached to it and a calibration verification had not been performed on it prior to use.

Explanation

The full range of the torque multiplier tool can not be calibrated on site, therefore the tool is scheduled for off-site calibration once a year. The calibration of the torque multiplier was purposely delayed so the next calibration due date would not fall during the 1989 refueling outage and possibly affect outage maintenance activities. To be sure maintenance personnel would not inadvertently use the tool in the meantime, it was decided that a Defective Tag should be attached to the torque multiplier.

The use of the torque multiplier was considered in the work planning effort for WRA 88-08325. A calibration verification of the tool for the range needed could be accomplished with the on-site calibrator. The plan called for a calibration check of the tool prior to use.

However, at the time the work was actually performed, the individual responsible for the calibration check was tied up in another important task. The Maintenance Supervisor made a decision to proceed with the job and complete the calibration check afterwards. This was in violation of our own procedure. It should be noted, however, that the WRA was not signed off as complete until it was verified that the torque setting was correct.

Corrective Action Taken and Results Achieved

The torque multipliers were immediately placed in a segregated and locked area in the maintenance shop. A meeting was held with the maintenance personnel on January 31, 1989, explaining the concern raised by the resident inspector and the requirements of our procedures relating to M&TE control.

All torque multipliers have since been sent off-site for calibration.

Corrective Action To Be Taken To Avoid Further Violations

As noted in the inspection report, the existing administrative procedures do not address what to do with equipment that is past due for calibration. These procedures will be revised to recommend the use of a defective tag on equipment that is past its calibration due date.

These revisions will be completed by June 1, 1989.

Date When Full Compliance Will Be Achieved

Full compliance was achieved with our existing procedures on January 31, 1989.

Please contact us if you have any questions relating to our response to this violation.



C E Larson
Vice President Nuclear Generation

- c: Regional Administrator-III, NRC
- NRR Project Manager, NRC
- Resident Inspector, NRC
- G Charnoff