



FLORIDA POWER & LIGHT COMPANY

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April 3, 1979  
L-79-79

Mr. James P. O'Reilly, Director, Region II  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

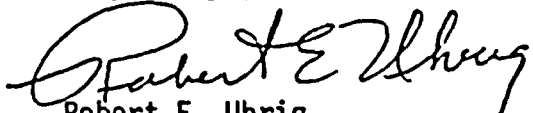
Dear Mr. O'Reilly:

Re: RII:EHW  
50-335/79-01

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

  
Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/MAS/cph

Attachment

cc: Harold F. Reis, Esquire



## ATTACHMENT

Re: RII:EHW  
50-335/79-01

### Finding

As required by Technical Specification (TS) 6.8.2 each procedure referenced in TS 6.8.1 shall be reviewed and approved by the Facility Review Group (FRG). TS 6.8.1.a includes those procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972. Section H of Appendix A discusses Measuring and Test Equipment Calibration Procedures.

Contrary to the above, calibration procedures, called by the licensee "Calibration Information Sheets", used to calibrate shop instruments which are then used to calibrate safety related instruments, have not been reviewed and approved by the FRG.

Further a change was made to one of the procedures; CIS #039, for General Radio Strobotac Type 1538A; on July 7, 1978. This change was not approved by the I&C supervisor as required by QI-12-PR/PSL-2.

### Response

We concur with the third paragraph regarding an unapproved change to a Calibration Information Sheet (CIS). The specific noncompliance with respect to CIS #039 has been corrected, and the personnel involved have been instructed on the correct method of making changes. As further corrective action, all calibration information sheets have been reviewed to ensure that no other unapproved changes exist.

As noted in the "Details" section of the inspection report, we disagree with the scope of the second paragraph of the finding. The bases for our position are:

- 1) Paragraph H.1 of Regulatory Guide 1.33 (November, 1972) states, in part, that "Procedures of a type appropriate to the circumstances should be provided to assure that . . . measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy". This paragraph does not require a specific calibration procedure for each laboratory device. It requires that procedures be provided to assure that certain equipment is controlled, calibrated, and adjusted at specified intervals.
- 2) Seven Quality Instructions have been written (and reviewed by the Facility Review Group as required by Technical Specification 6.8.2) to assure that Maintenance & Test Equipment (M&TE) is maintained accurate by proper controls and periodic calibration.

- 3) Quality Instruction (QI) 12-2, which was reviewed by the FRG, specifies controls necessary to assure equipment accuracy and includes instructions regarding calibration information sheets. In addition, QI 12-2 requires that changes to instrument lists, calibration schedules, and calibration information sheets be approved by the Instrument and Control Supervisor (a member of the FRG) to provide administrative control.
- 4) Each calibration of laboratory equipment in which a comparison is made is recorded on a calibration sheet. The calibration sheet is reviewed by a supervisor and a quality control representative. These controls assure that only acceptable equipment is used to calibrate installed instruments.
- 5) Instruction to technicians about making adjustments to laboratory equipment between the "as found" condition and the "as left" condition during calibration is not within the scope of paragraph H.1 of Regulatory Guide 1.33 (November, 1972). Paragraph H.2 refers to this type of instruction. Paragraph H.2 does not include laboratory equipment.
- 6) Approximately 37 St. Lucie procedures affecting installed M&TE have been written (and reviewed by the FRG).

Based on the above, the procedures for control of Measuring and Test Equipment at St. Lucie meet the requirements of Paragraph H of Appendix A to Regulatory Guide 1.33 (November, 1972).