ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
AREA CODE 716 546-2700

May 10, 1985

Dr. Thomas E. Murley, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Dr. Murley:

In accordance with NRC Inspection Report No. 50-244/85-05, which stated:

As a result of the inspection conducted on February 4-8, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

> The facility Technical Specification 6.8.1a states that written procedures shall be established covering activities referenced in Appendix "A" of Regulatory Guide 1.33, November 1972. Section "H" of Regulatory Guide 1.33 requires that procedures should be provided to assure that tools, gauges, instruments, controls and other measuring and testing devices are properly controlled, calibrated and adjusted at specified periods to maintain accuracy. The Rochester Gas and Electric Corporation Procedure A-1201 requires that tools, gages, instruments and other measuring and testing devices, used in activities affecting quality, are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within specified limits.
>
> Contrary to the above, Dillon Load Cell S/N LAB - 2791, was not controlled or calibrated during the period from 12/3/84 to 2/8/85 when it was used to perform acceptance tests on modified spent fuel racks in that it was not calibrated but single point load tested in lieu of calibration over its useful or working range.

1/0 IE 01

The following is submitted in response:

The application of the Dillon Load Cell for the purpose of acceptance testing of the modified spent fuel storage racks was that of acting as a "go", "no-go" gauge. The contention that the load cell be subjected to a full range calibration does not apply for this specific usage. It is noted that the Dillon Load Cell single point calibration is construed to apply specifically to the drag testing of the storage racks as defined in the appropriate System Modification Procedure and not to other applications.

Calibration is defined in Ginna Quality Assurance Manual as "Comparison of items of measuring and test equipment with reference standards or with items of measuring and test equipment of equal or closer tolerance to detect and quantify inaccuracies and to report or eliminate those inaccuracies. For this specific application, the "working or useful range" is defined as a 50 lb. interval. Through the Responsible Engineer and the Lead Test Engineer it was determined that a single point calibration using a 50 lb. certified traceable weight was sufficient. This calibration is documented in Surveillance Report 84-0886.

Rochester Gas and Electric agrees that delineation of specific steps in A-1201 regarding the Dillon Cell is not addressed. However, this procedure is written to encompass all general testing equipment. The testing equipment is categorized according to specific applications. For the Dillon Load Cell, this may be classified as Mechanical Measuring Equipment. Since this was a one time application, the documentation such as step by step calculational methods, traceability, etc. would be delineated in the Surveillance Report.

It is noted that the single point calibration using the 50 lb. certified weight measured approximately 50 lbs on the readout scale. As discussed in the Inspection Report, it is agreed that the accuracy of reading the 20 lb. subdivision scale introduced the potential for some error. Industry standards state that the scale reading accuracy can only be assured to 1/2 subdivision or for this instance, 10 lbs. Bearing this in mind, the data for each rack drag test was reviewed and it is noted that at all instances with the exception of one, the drag test never exceeded 30 lbs. For the one exception, the resolution involved plugging of the affected cell.

DATE May 10, 1985
TO Dr. Thomas E. Murley

Since it is contended that the calibration requirements were met for this specific use for the load cell, no corrective action is deemed necessary. However to preclude the potential for violating calibration requirements for other applications of the Dillon Cell, an investigation was conducted. To date, this investigation has identified the load cell that operates on the Manipulator Crane for fuel transfer system. This particular unit has recently been calibrated to National Bureau Standards over its working range of 0 to 2400 lbs. Procedures are being established to control the recalibration requirements pending vendor recommendations and industry recommended practice.

Very truly yours,

Bruce A. Snow for

Roger W. Kober

Subscribed and sworn to me
on this 10th day of May 1985

Lynn I. Hauck

LYNN I. HAUCK
NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1986