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October 17, 1980

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region 1
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Gentlemen:

COMBINED INSPECTION 50-272/80-19 AND 50-311/80-14

We have reviewed the report of the subject inspection conducted by Messrs. G. Napuda and G. Simonetti of your office on July 28-31, August 1, and 4-8, 1980. Our response to the deficiencies identified in Appendix A is as follows:

Item A Deficiency

10 CFR 50, Appendix B. Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures...of a type appropriate to the circumstances and shall be accomplished with these instructions, procedures...".

Listed below are examples of the licensee's failure to implement/follow established procedures:

a. FSAR Amendment 43, Section D.2.2 states in part, "The QA program shall be applied during the pre-operational and operational phases to the extent consistent with the items or activities important to safety." "These activities shall be performed in compliance with...quality-related regulatory requirement which include...(5) Regulatory Guide 1.38...10/76."

Regulatory Guide 1.38 (10/76) endorses ANSI N45.2.2 Section 5.4 of the Standard states in part, "A system or method of identifying the status of items...shall be employed that clearly indicates whether items are acceptable or unacceptable for installation." A controlled physical separation is an acceptable equivalent method." "When tags are used...;

tags shall be securely affixed to the items and displayed in an area that is readily accessible."

AP-19, Revision 3, Section 6.4.3 states in part, "The QA reject tag shall be attached to the item and the rejected item shall remain in the hold area...".

SR-3, Revision 2, Section 4.5.2 states in part, "If required documentation is incomplete...(a) the storekeeper shall attach a QA reject tag...". Section 4.5.3 states in part, "If the inspection of the safety related, QA required or CCI is unacceptable...(a) the storekeeper shall...attach a QA reject tag (Appendix C) to the item." "(b) All deficient items shall remain in the Hold Area in Warehouse #2." "If the designated Hold Area is filled...a temporary hold area may be designated."

Contrary to the above, lot 26 of Boric Acid shipment P.O. 727471, received at Warehouse #2 on July 2, 1980, and designated unacceptable during the receipt inspection was not being held in a Hold Area nor was the referenced QA reject tag fixed to the shipment and displayed in a readily accessible area.

b. QAP-17, Revision 5, Paragraph 4.2.3 states in part "...inspection records shall identify the...inspector or data recorder."

Contrary to the above, warehouse inspection records for the period November 1979 - June 1980 (with the exception of April 1980) were without appropriate means of identifying the inspecting official.

c. SR-8, Revision 1, Section 4.3.2 states in part, "The Office Administrator or his designee shall perform monthly inspections of all safety related storage areas... Results of storage inspections shall be forwarded to the Technical Document Room for microfilming per AP-11."

Contrary to the above, the licensee was unable to provide data indicating the monthly inspection for April 1980 had been completed. Furthermore, the results of the storage inspections were not being forwarded to the Technical Document Room for microfilming.

Item B, Deficiency

Technical Specifications, Section 6.8.1 states in part, "Written procedures shall be established, implemented and maintained covering activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 (2/78)."

Regulatory Guide 1.33, Appendix A, states in part, "The following are typical safety-related activities that should be covered by written procedures...8. Procedures for Control of Measuring and Test Equipment..."

AP-22, Section 3.1 states in part, "All measuring and test equipment...shall be calibrated and checked in accordance with approved procedures." "Procedures and data sheets shall be consistent with the vendor's manual requirements..."

The John Fluke Instrument Manual for Model 8120A Digital Multimeter, Section 4-63 states in part, "Calibration should be performed under the following test conditions: ambient temperature 25°C + 5°C, relative humidity less than 70%."

Contrary to the above, the licensee was unable to produce records that the following John Fluke Digital Multimeters, Model 8120A, calibrated on July 28, 1980 and subsequently used on safety-related equipment were calibrated under the environmental conditions specified by the vendor.

-- Serial Number (SN) PD-003
-- SN PD-004
-- SN PD-187

Reply to Item A(a)

Due to the quantity of boric acid drums received, it was impossible to store all the drums in the Hold Area; the requirement for a temporary Hold Area was overlooked. A reject tag was placed on one of the drums, but this tag evidently had fallen off.

Prior to the completion of your inspection, a temporary Hold Area for the drums was established by placing plastic stanchions and yellow rope with a "Hold" sign on the rope. A new reject tag was placed on the drums.

In the future, temporary Hold Areas will be established to segregate the boric acid drums on hold and a reject tag will be affixed to those drums which face out.

We are in compliance now.

Reply to Item A(b)

The requirement to identify the inspecting official was overlooked.

The form used to perform the inspections has a blank space with the heading "Office Administrator or Designee" intended to identify who made the inspection. All previous inspection forms have now been signed by the Office Administrator who performed the inspections.

In the future the Office Administrator, or designee, shall sign the form used to perform the inspection.

We are in compliance now.

Reply to Item A(c)

The microfilming of monthly inspection reports was inadvertently overlooked. The April storage inspection was completed. However, due to the heavy work load the proper documentation was overlooked.

In the future the monthly storage inspections will be microfilmed at the end of each year.

A suspense file has been established and will be pulled each month to ensure the inspections are made and inspection reports are microfilmed at year end.

We are in compliance now.

Reply to Item B

This inspection took place during the time period when the Performance I&C Department, including the Calibration Lab, was in the process of changing locations. During this move the temperature and relative humidity recorder (RHT-IV) became misplaced. This discrepancy was not noticed until the time of the inspection.

As soon as this deficiency was brought to our attention, a new recorder was calibrated and placed in the Calibration Lab. Also, at the same time, the multimeters listed were taken out of service and subsequently recalibrated; they were not found to be out of calibration.

This is an isolated case caused by the department relocation. Additionally, any time an instrument calibration becomes suspect for any reason the instrument is recalibrated to verify accuracy. If it is found out of calibration, all equipment measured by the suspect instrument is evaluated in accordance with AP-22, Section 10.

We are in compliance now.

If you have any further questions with regard to this matter we will be pleased to discuss them with you.

Sincerely,

F W Schmidt

CC Director, Office of Inspection and Enforcement
Nuclear Regulatory Commission
Washington, DC 20555