

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 31, 1979

Mr. W. P. Haass, Chief
Quality Assurance Branch
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Serial No. 417
LQA/MDT:esh

RE: Docket Nos. 50-280, 50-281
50-338, 50-339
50-404, 50-405

Dear Mr. Haass:

Virginia Electric and Power Company's letter Serial No. 411, dated January 10, 1977 submitted amendment three to our topical report entitled, "Quality Assurance Program-Operations Phase" (VEP-1-1A) which was approved by Nuclear Regulatory Commission letter dated February 22, 1977.

This letter is submitted to indicate exceptions to ANSI N45.2.4 "Installation, Inspection, and Testing Requirements of Instrumentation and Electrical Equipment During the Construction (Operations) of Nuclear Power Generating Stations," and ANSI N45.2.8, "Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction (Operations) Phase of Nuclear Power Plants," and to provide alternatives to the requirements therein.

ANSI N45.2.4-1972, as referenced by Regulatory Guide 1.30, 8-11-72, to which Vepco has committed, requires the following:

Paragraph 2.5.2, "Calibration Control," states in part "...and equipment suitably marked to indicate date of next required calibration."

Paragraph 6.2.1, "Equipment Test," states in part "...requiring calibration shall be tagged or labeled on completion indicating date of calibration and identity of person that performed the calibration."

Additionally, ANSI N45.2.8, Draft 3, Rev. 2, April 1973, "Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction (Operation) Phase of Nuclear Power Plants," to which Vepco has previously committed, requires the following:

Paragraph 2.8.2, "Calibration Control," states in part "...equipment suitably marked so that calibration status can be determined."

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Veeco wishes to take exception to those portions of the paragraphs listed above and provide the following alternative:


The "Measuring and Test Equipment Program" provides that items of measuring and test equipment and reference standards shall be tagged or labeled indicating the date of calibration, identity of person performing calibration and date of recalibration. These items are in a calibration program which requires recalibration on a specified frequency or in certain cases, prior to use.

The "Periodic Test Program" provides for instrumentation and electrical equipment in the categories of (1) instruments installed as listed in the Technical Specifications, (2) installed instrumentation used to verify Technical Specification parameters, and (3) installed safety-related instruments and electrical equipment that provide an active function during operation or during shutdown i.e., vice being designated safety related solely because the instrument is an integral part of a pressure retaining boundary, shall be in a calibration program. This program provides, by the use of equipment history data, status, records, and performance schedules, for the date that calibration is due and indicates the status of calibration. The identity of person(s) performing calibration is provided on the calibration documents.

These exceptions and alternatives provide the necessary controls to comply with 10 CFR 50, Appendix B, Criterion XII, "Control of Measuring and Test Equipment," which requires these devices to be calibrated and adjusted at specified periods to maintain accuracy within necessary limits, and Criterion XIV, "Inspection, Test and Operating Status," which states "...measures to be established which indicate by the use of markings such as stamps, tags, labels, routing cards, or other suitable means the status of inspections and test performed upon individual items of the nuclear power plant..."

Commencing with the date of this letter, Veeco shall provide for the calibration of Measuring and Test Equipment as indicated in the alternatives proposed in this letter, unless otherwise notified.

Very truly yours,


E. A. Baum, Executive Manager
Licensing & Quality Assurance

cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
Region II

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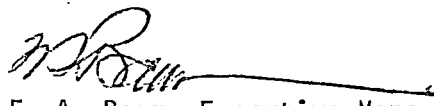
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