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December 6, 1977

MEMORANDUM FOR: F. J. Long, Chief, RADMIS Branch, RII
 THRU: J. H. Sniezek, A/B for FC, DRGI, IE
 FROM: G. R. Klingler, FC, DRGI, IE
 SUBJECT: ACCEPTABILITY OF "SAFETY-RELATED" DESIGNATIONS
 AT OCOONEE (F2 4047 H2)

Your memo of November 4, 1977, requested that an IE:HQ position be established with regard to a position RII has taken on instrumentation calibration records at Duke Power Company's Ocoonee Plant. In reviewing this matter, we have discussed the information provided by RII with IE personnel as well as personnel in NRR (J. W. Gilray and A. M. Garland, QAB, NRR).

The Ocoonee technical specification Section 6.5.2.g requires calibration records for a period of six years for calibration performed in accordance with surveillance requirements for safety-related items. The Duke Power Company QA topical report commits Ocoonee to Regulatory Guide 1.83 (Rev. 1) which endorses ANSI N45.2.9-1974. The requirements of ANSI N45.2.9 for calibration records outside the purview of the technical specification requires storage only until the instrument is recalibrated. The calibration program applied by Ocoonee for those instruments in contention appears adequate.

The IE:HQ position for handling this matter, which is consistent with the requirements of NC 0300 is as follows:

1. Items which the Region believes should belong on the licensee's "Q"-list should be identified to the licensee along with the Region's rationale.
2. If the licensee accepts this and adds the identified items to the Q-list, he is then committed to apply the requirements of his QA program to those items.
3. If the licensee refuses to accept the Region's recommendation, the Region should notify IE:HQ. The notification should include the rationale of the Region for including the items on the Q-list as well as the licensee's rationale for not including the items.

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- 4. IE:HQ will make a determination to recommend (or not) to BOR/NRR the inclusion of the items as a part of the licensee's Q-list.
- 5. When the items have been added to the Q-list, the licensee can then be cited for failure to apply his QA program to those items.

In our view, the real issue to be considered is whether or not the technical actions currently employed by the licensee are adequate and commensurate to the importance of the systems involved, rather than whether or not the item is designated as a Q-listed item.

It is suggested that RII communicate with the licensee regarding those items identified in Enclosure 2 to your November 4, 1977, memo. Those items that the licensee does not include as part of his QA for operations program should be identified to IE:HQ along with the Region's rationale for inclusion (i.e., what should the licensee do for each item that he presently is not doing) as well as the licensee's rationale for not including them.

Please contact me if you require any further assistance in this matter.

GR

G. R. Klingler, Field Coordination
Division of Reactor Operations
Inspection, IE

cc: C. E. Alderson
K. V. Seyfrit

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