

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION IV

IE Inspection Report No. 50-267/80-14

Docket No. 50-267

License No. DPR-34

Licensee: Public Service Company of Colorado
P. O. Box 840
Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

Inspection At: Fort St. Vrain Site, Platteville, Colorado

Inspection Conducted: June 16-19, 1980

Inspectors: L. A. Yandell 7/10/80
L. A. Yandell, Reactor Inspector Date

M. T. Aneshansley for 7/10/80
M. T. Aneshansley, Reactor Inspector Date

Reviewed by: J. E. Gagliardo 7/11/80
J. E. Gagliardo, Chief, Nuclear Support Section Date

Approved by: T. F. Westerman 7/11/80
T. F. Westerman, Chief, Reactor Projects Section #1 Date

Inspection Summary

Inspection conducted during the period of June 16-19, 1980
(Report No. 50-267/80-14)

Areas Inspected: Routine, unannounced inspection of control and calibration of measuring and test equipment. The inspection involved forty-two (42) inspector-hours on-site by two (2) NRC inspectors.

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Results: Within the areas inspected, two items of noncompliance were identified (deficiency - Failure to document qualifications of personnel performing calibrations on Measuring and Test Equipment, paragraph 2.b.; and infraction - Failure to provide a record of test equipment, paragraph 2.a.)

DETAILS1. Persons Contacted

- *L. Brey, QA Manager
- W. Craine, Maintenance Superintendent
- W. Franek, Results Supervisor
- *E. Hill, Operations Superintendent
- *W. Hillyard, Administrative Services Manager
- R. Lamb, Electrical Working Forman
- *F. Mathie, Operations Manager
- *P. Tixier, QA Engineer
- *D. Warembourg, Manager Nuclear Production
- P. Zimmerman, Senior Instrument Technician

The inspectors also contacted other plant personnel including maintenance men, electricians, technicians and administrative personnel.

*Those present at exit interview.

2. Test and Measurement Equipment Program

- a. The inspectors reviewed the licensee's program for control of test and measurement equipment to ensure that (1) criteria for calibration frequency have been established, (2) equipment inventory lists and calibration procedures exist, (3) equipment is marked with latest and next due calibration dates, (4) a system is established for calibrating equipment prior to due date, and (5) controls exist for evaluating out-of-calibration equipment and the items previously tested or measured by this device.

The following procedures and records were reviewed that describe and implement the Fort St. Vrain program for controlling test and measurement equipment:

ADM-14, Administrative Procedure for Calibration of Plant Instrumentation and Test Standards

QAP-1100, Calibration and Maintenance of Tools, Instruments and Control Equipment.

-Standard and Test Equipment Lists.

RP-21, Results Calibration Standards.

-Calibration Standard Accountability Cards.

PME-29, Calibration of Electrical Maintenance Meters and Thermometers.

-Instrument Usage Record.

MP-102, Procedure for the Calibration of Mechanical Maintenance Tools and Equipment

A representative sample of surveillance procedures were reviewed to identify test equipment and gates used for comparison with calibration records. The following equipment calibration records were reviewed:

Results Section

PI-0005, 0-3000 psig test gauge
PSC 3106, Simpson 260
PSC 3131, DC Calibrator, Foxboro 8121
PSC 3135, Picoampere source, Keithley 261
PSC 3147, DVM 8600A
PSC 3150, DVM 8600A
PSC 3153, DVM 8100B
PSC 3154, DVM 8120A-01
PSC 3172, Counter, Ortec 772
PSC 3175, Function Generator
PSC 3198 Simpson 313-2

Mechanical Maintenance Group

Micrometer set, 1"-11"
Argon regulator, FSV w-8
Torque wrench, FSV MI-30
Torque wrench, FSV MI-27
Micrometer, FSV MI-2

Electrical Maintenance Group

M-3825, Simpson 260
M-3699, Simpson DMM
M-3010, Weston model 904, AC voltmeter
M-3081, Simpson DMM

As a result of these reviews, the inspectors had the following findings:

While reviewing the Station Battery and PPS Check Surveillance Procedure SR 5.6.2a-W for February 11 and April 16, 1980, it was noted by the inspector that the test conductor had failed to identify the calibration equipment used in Section 3.0. This is contrary to the requirements of ADM-13, Administrative Procedure for Technical Specification Surveillance which states in Section 2.5d that the test conductor "is responsible for assembling test equipment, special tools and other items specified by the test procedure and identifying them in Section 3.0 of the SR."

While reviewing the Calibration Standard Accountability Cards, it was noted by the inspector that the card for PSC-3178 did not identify device PSC-3172 as being calibrated by this device. This is contrary to the requirements of 1) QAP-1100, Calibration and Maintenance of Tools, Instruments and Control Equipment, step 3.1.10 which requires that "lists be maintained of each standard and test equipment versus the equipment it was used to calibrate or measure," and 2) RP-21, Results Calibration Standards, Section III.A. which requires that "the appropriate entries shall be made on the Calibration Standard(s) Accountability Card(s)."

The inspector noted also that no entries had been made on the accountability cards since about October 1979 identifying test equipment used for surveillance procedures. This is contrary to RP-21, Section III.A. which requires that "the appropriate entries shall be made on the Calibration Standard(s) Accountability Cards." It was determined that the record of test equipment used for surveillance procedures was being kept on a separate document.

While reviewing the Instrument Usage Record it was noted by the inspector that the record failed to identify that for surveillance procedure SR 5.6.2b-Q, device M-3699 was used for a February 15, 1980 calibration and device M-3081 was used for a May 9, 1980 calibration. This is contrary to the requirements of Step 3.1.10 of QAP-1100 and step 9.1.6 of PME-29, Calibration of Electrical Maintenance Meters and Thermometers, which request that an "Instrument Usage Record will be maintained on safety-related equipment."

These examples of failure to follow procedures constitute an apparent item of noncompliance at the infraction level (80-14-01).

In conjunction with these findings, the inspector expressed concern to the licensee that surveillance procedures were being signed off by supervisory and management personnel without proper review. Section 6.0 of ADM-13, Administrative Procedure for Technical Specification Surveillance states that the presence of initials or signatures indicates that the procedure has been properly performed and

reviewed for completeness. Examples identified in this and earlier reports indicate that licensee personnel are not fully implementing this requirement by performing an adequate review of surveillance procedures. The licensee is requested to address this matter when responding to the item of noncompliance.

- b. The inspector reviewed records of calibration of measuring and test equipment which was calibrated by results department personnel. The following records were reviewed:

<u>Instrument</u>	<u>Calibration Date</u>	<u>Person Performing Calibration</u>
Pressure Test Gauge, Serial 0005	1-7-80	J. Pinner
Ortec Counter, Serial M3172	2-17-80	P. Zimmerman
Pressure Test Gauge, Serial 112	4-22-80	T. Kennedy

ADM-14, Administrative Procedure for Calibration of Plant Instrumentation and Test Standards required that only qualified personnel be assigned to calibrate test equipment. The qualification requirements for results department personnel were established by the Training Procedures Administrative Manual, Form R-1.

Qualification requirements for Instrument Technicians and Senior Instrument Technicians did not include calibration of measuring and test equipment. Calibration records indicated that technicians were actually performing the calibrations. 10 CFR 50, Appendix B, Criteria XVII requires that "sufficient records be maintained to furnish evidence of activities affecting quality." The failure to provide sufficient documentation of the qualification of Instrument Technicians and Senior Instrument Technician constitutes an apparent item of noncompliance at the deficiency level. (80-14-02).

- c. While examining several pieces of test equipment and their calibration stickers, the inspectors noted that many devices called for six month calibration intervals. This conflicts with the official, computerized calibration schedule maintained by the Results Section that in general, identifies one year calibration intervals. This in turn conflicts with ADM-14 (Sections 3.2.4 and 3.3.4) which requires that the calibration stickers, (not a computerized list) show the next calibration due date. Everyone interviewed was aware of this conflict and recognized that the computerized list was the governing document for scheduling calibrations. QASP 1102, attachment 6.1-79-02 dated October 30, 1979, prepared by the FSV QA organization had already identified this issue and recommended that this conflict be resolved. This will remain an open item until this action has been completed and reviewed. (open item 80-14-03).

No other apparent items of noncompliance or deviation were identified.

3. Exit Interview

An exit interview was conducted on June 19, 1980 with Mr. Warembourg and other members of the plant staff to summarize the scope of the inspection and the findings. In responding to the matter of adequate review of surveillance procedures, the licensee stated that an extensive QA audit in this area has already been initiated to address this issue and provide recommendations for corrective measures.