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

Region I

Report No.	50-334/80-05		
Docket No.	50-334		
License No.	DPR-66 Priority	Category _	C
Licensee:	Duquesne Light Company		
	435 Sixth Avenue		
	Pittsburgh, Pennsylvania 15219		
Facility Na	me:Beaver Valley, Power Station, Unit No.	1	
Inspection	at: Shippingport, Pennsylvania		
	conducted: February 5-8 and 12-13, 1980		
Inspectors:	N. Blumberg, Reactor Inspector		24/80 to signed
		da	te signed

Approved by:

auna W. Baunack, Acting Chief, Nuclear

Support Section 2, RO&NS Branch

Inspection Summary:

Inspection on February 5-8 and 12-13, 1980 (Report No. 50-334/80-05)

Areas Inspected: Routine, unannounced inspection by a regional based inspector of licensee action on previous inspection findings; administrative control of safety related calibrations; surveillance calibrations of safety related components and equipment required by Technical Specifications; calibrations required by Technical Specifications of components and equipment associated with safety related systems and/or functions; calibration and control of test equipment; witnessing of calibrations; technician qualifications; and, facility tour. This inspection involved 42 inspector-hours on site by one NRC regional based inspector.

date signed

date signed

Results: Of the eight areas inspected, no items of noncompliance were identified in four areas; and four items of noncompliance were identified in four areas (Deficiency failure to post temporary changes and revisions - see paragraph 2; deficiency - failure to use plant approved procedure to perform Technical Specification Calibrations and to maintain records - see paragraph 4.C (1); Infraction - failure to establish technically adequate procedure and failure to use procedure for performance of a calibration see paragraph 5.C (1); and Deficiency - failure to document calibration of test equipment and use of out of tolerance test equipment - see paragraph 6.b(1)). Region I Form 12

(Rev. April 77)

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DETAILS

1. Persons Contacted

- E. Concrad, Duquesne Light Company (DLC) Environmental Coordinator
- R. Druga, Nuclear Shift Operating Foreman
- *J. Forney, Instrument Engineer
- *W. Glidden, Quality Assurance Engineer
- *R. Hansen, Maintenance Supervisor
- *F. Lipchick, DLC Compliance Engineer
- *L. Schad, Operations Supervisor
- *J. Werling, Station Superintendnet

NUS Corporation

D. Smiley, Field Services Coordinator Meteorological Programs, NUS Corporation

USNRC

*D. Beckman, Resident Reactor Inspector *J. Hegner, Resident Reactor Inspector

The inspector also interviewed other licensee employees including, Reactor Operators, instrument and control technicians and clerical personnel.

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Closed) Deficiency (334/79-25-01): Controlled copies of surveillance procedures were not maintained in current status and a safety related surveillance was performed which did not contain the latest revision. The inspector reviewed the surveillance procedures in question and determined that they are now up to date. A random check of surveillance procedures located in the shift supervisor's office found no other procedures which did not contain the latest revision.

(Closed) Infraction (334/79-14-02): Heatup and cooldown rates of the Pressurizer and Reactor Coolant System were not being periodically monitored as required by Technical Specifications; nor did plant operating procedures specify the surveillance requirements for monitoring. The inspector verified that appropriate operating procedures have been revised to specify periodic monitoring of the heatup and cooldown rates. In addition, the inspector verified by interview with reactor operators and review of computer trend logs that periodic monitoring of heatup and cooldown rates was accomplished during the most recent shutdown and cooldown of the reactor on December 2, 1979.

(Closed) Inspector Follow Item (334/78-20-07): Two managerial personnel, who reviewed a completed test, were not familiar with reason why certain actions were not taken concerning test data. While occassional oversights have subsequently occurred concerning review of data, recent inspections in the area of surveillance and calibration do not indicate significant problem in this area. This item is closed.

(Closed) Inspector Follow Item (334/78-20-06): Date of calibration of test instrument, Eberline MS-3, was not recorded in MSP 43.07B1 and MSP 43.07B2 and other procedures as required by those procedures and that operability check. The inspector has verified that all but five procedures in the procedure series MSP 43.08R to 43.41R "Radiological Calibrations" have been issued and a spot check of data sheets in those procedures requires recording the date of calibration or operability check of measurement instruments.

(Closed) Deficiency (334/79-14-03): Failure of one Overtemperature Delta-T, Reactor Trip System Channel was not reported. The inspector verified that Licensee Event Report 79-34/03L was submitted on September 18, 1979 to report this occurrence.

(Closed) Deficiency (334/79-14-01): Operating Manual Change Notices (OMCN's) which had passed their expiration date still posted to procedures; a revision cancelled an OMCN but failed to include paragraph which was previously changed by the OMCN; pen and ink changes made to operating procedures without proper authorization; OMCN posted to a procedure although superceded by a temporary operating procedure; and wrong change to a log sheet used on 77 different occasions. The inspector verified that the specific examples stated in this item of noncompliance have been corrected, hence this specific item is closed.

However, a random check of several other items indicates that adequate controls of OMCN's have not yet been obtained. On February 12, 1980 OMCN's 80-11, 80-12, and 80-13 were observed posted to log sheet L5-15 control copies in operating manuals located in the Control Room and Control Room Shift Supervisor's office although Revision 16 to BVPS-OM 1.54.3 which replaced these OMCN's was issued on February 7, 1980 and was observed posted to a set of operating manuals located in another office. The file of log sheets in the Control Room from which the actual log sheets are used did contain Revision 16 to log sheet L5-15.

OMCN 80-3 changed some tolerances on log sheet L3-9 for logging portions of the Meteorlogical Monitoring System; however, copies of L3-9 in the Control Room file which are used for surveilingte, did not have OMCN 80-3 posted. The tolerances specified in OMEN 80-3 were less conservative than those currently specified in log sheet L3-9; hence, no technical problem was present.

The improper posting of temporary changes and procedure revisions is contrary to Technical Specification 6.8.1.a, Regulatory Guide 1.33 Appendix A, Paragraph A, and BVPS-OM 1.48.3.E.6 and 1.48.9.L, and constitutes a deficiency level item of noncompliance (50-334/80-05-04).

(Closed) Unresolved item (334/78-21-01): Procedure revisions are required to ensure periodic level checks of the spent fuel pool during refueling operations to meet Technical Specification requirements. The inspector verified that periodic checks of spent fuel pool level were being accomplished as per Log Sheet L5-15; in addition, FP-LDW-Rl, Refueling Procedure for Cycle I-II, Revision 1, December 7, 1979, Section 9.2.15.A specifies the requirement for taking periodic level checks of the spent fuel pool as required by Technical Specifications.

(Closed) Inspector Follow Item (334/79-14-04): Technical Specification 3.7.2.1.a states "a. Reduce the steam generator pressure of the applicable side to (less than or equal to) 200 psig within 30 minutes, and..."; BVPS-OM 1.24.2, Section 2, Precautions and Limitations, paragraph 3.a states "a. Reduce the pressure of the applicable steam generator or to (less than or equal to) 200 psig, and..." omitting the T.S. requirement that this be done in 30 minutes. So far the licensee has taken no action to correct this paragraph; however, the licensee stated a change would be forthcoming. This item is unresolved pending licensee action and subsequent NRC:RI review (334/80-05-05).

3. Administrative Control of Safety Related Calibrations

The inspector reviewed the licensee's administrative procedures relating to the performance of calibration of safety related components as a basis for reviewing test procedures and calibration data sheets. The following procedures were reviewed:

- -- SAD-2, Procedure Review, Approval and Issuance, Revision 4, February 12, 1979.
- -- SAC-7, Control of Measuring and Test Equipment, Revision 0, August 1, 1974.

- SAD-16, Regulatory Guide 1.58 (ANSI N45.2.6 1973) Qualification of Nuclear Power Plant, Inspection, Examination and Testing Personnel, Revision 6, December 12, 1977.
- -- Beaver Valley Power Station Maintenance Manual (BVPS-MM), Chapter 1, Section D, Maintenance Surveillance Procedures, Revision 16, October 15, 1979.
- -- BVPS-MM, Chapter 1, Section F, Control and Calibration of Measuring Devices, Revision 9, December 13, 1979.
- -- BVPS-MM, Chapter 1, Section 0, Calibration Program, Revision 4, August 9, 1979.
- -- BVPS-MM, Chapter 1, Section W, Maintenance Procedure for Procedure Control, Revision 2, March 2, 1979.
- -- QAP, DC-12, Control of Measuring and Test Equipment, Revision 8, August 16, 1976.
- -- QAP, OP-12, Control of Measuring and Test Equipment, Revision 3, November 20, 1979.

No items of noncompliance were identified.

- 4. <u>Suveillance Calibrations for Safety Related Components and Equipment</u> Required by Technical Specifications
 - a. The inspector reviewed calibration procedures and associated data sheets on a sampling basis to verify the following:
 - -- Calibration frequency requirements have been met;
 - -- Applicable system status during component calibations was in conformance with the Technical Specification limiting conditions of operation;
 - -- Procedure format provided detailed stepwise instructions;
 - Procedure review and approval were as required by Technical Sepcifications;
 - Trip points of calibrated components were in conformance with Technical Specification requirements; and,

- Technical content of procedures was sufficient to result in satisfactory calibration.
- b. The following calibration and functional procedures/data were selected for the above review:
 - -- MSP 1.04, Reactor Protection Logic System Train "A" Bi-Monthly Test, Revision 10, July 27, 1979 and Revision 8, August 7, 1979. Data reviewed for tests performed on September 22, 1979; July 28, 1979; and February 7, 1979.
 - -- MSP 2.07, Nuclear Instrument Intermediate Range N35 Calibration, Revision 0, May 21, 1978. Data reviewed for test performed May 24, 1978.
 - -- MSP 6.08, F-435 Reactor Coolant Flow Loop 3 Protection Channel II Test, Revision 3, February 17, 1978. Data reviewed for tests performed on November 19, 1979; October 23, 1979; September 25, 1979; August 28, 1979; and August 8, 1979.
 - MSP 6.38, T-RC 412 Delta T, Tavg. Protection Instrument Channel I Calibration, Revision 2, February 23, 1978. Data reviewed for test performed July 3, 1979.
 - -- MSP 6.20, Delta T Tavg. Protection Instrument, Revision 6, June 4, 1979. Data reviewed for tests performed on October 5, 1979; September 6, 1979; August 10, 1979; and July 15, 1979.
 - -- MSP 6.31, F-435 Reactor Coolant Flow Loop 3 Protection Channel II Calibration, Revision 3, February 23, 1978. Data reviewed for test performed on September 9, 1978.
 - -- MSP 36.06C, IC Reactor Coolant Pump 4KV Bus Underfrequency Relay Test, Revision 3, May 31, 1977. Data reviewed for tests persued on November 20, 1979; October 23, 1979; September 26, 1979; and August 21, 1979.
 - -- MSP 36.10C, IC Reactor Coolant Pump 4KV Bus Underfrequency Relay Calibration, Revision 2, May 31, 1977. Data reviewed for test performed on June 22, 1978.
 - -- MPS 45.01, Seismic Monitoring Instrumentation Test SMA-3/SMP-1 System, Revision 4, January 15, 1980. Data reviewed for test performed January 17, 1980.

- -- MSP 45.02, Seismic Monitoring Instrumentation Calibration -Engdahl System, Revision 1, January 6, 1976. Data reviewed for test performed on September 25, 1978 by use of a separate vendor procedure.
- -- MSP 45.04, Peak Recording Accelerometer Calibration Teledyne Geotech, Revision O, January 6, 1976. No data reviewed for this test.
- -- MSP 45.17, Meteorological Monitoring Calibration Test, Revision 1, August 15, 1977. Data reviewed for tests performed November 11, 1979 and April 27, 1979 by use of a separate vendors procedure.
- -- OST 1.1.2, Turbine Trip Channel Functional Test, Revision 8, April 18, 1977. Completed tests reviewed for tests performed November 11, 1979; September 20, 1979; August 15, 1979; and March 6, 1979.
- -- OST 1.2.2, Nuclear Intermediate Range Channel Functional Test, Revision 14, October 24, 1979. Data reviewed for tests performed on October 16, 1979; September 22, 1979; and August 19, 1979.
- -- OST 1.2.3, Nuclear Source Range Channel Functional Test, Revision 14, October 24, 1979. Data reviewed for tests performed on October 16, 1979; September 24, 1979; August 19, 1979; and August 11, 1979.

c. Findings

 rechnical Specification Tables 4.3.4 and 4.3-5 require periodic calibrations of seismic monitoring and meteorological monitoring instrumentation respectively. The licensee has approved procedures for conducting these calibrations - MSP 45.02 for calibration of Triaxial Seismic Switches as required by T.S. Table 4.3-4.3; and MSP 45.17 for calibration of all meteorological instruments as required by T.S. Table 4.3.5.

The calibration of the triaxia? seismic switches was last accomplished on September 1578. Although MSP 45.02 was in effect at that time. We altoration was performed by an outside vendor using the roved procedure. At a later date, the data appears the been approved by the Onsite Safety Committee (OSC).

The only record of calibrations of meteorological instrumentation onsite was a calibration performed per MSP 45.17 January 1979. / copy of MSP 45.17 was also on file indicating a calibration was performed April 1979; however, no data was entered in this procedure and a partial set of data sheet copies were attached stamped "Preliminary". During the inspection, a meeting was arranged by the licensee, which included licensee representatives, a representative of NUS Corporation, and the inspector. The representative from NUS Corporation presented sufficient documentation to the inspector that calibrations of meteorological instrumentation were being accomplished within T.S. frequencies and that calibrations were technically adequate. These calibrations were being accomplished by NUS corporation by use of an NUS procedure which had not been reviewed by the OSC and records of these calibrations were not being maintained by the licensee (except for partial data sheets from April, 1979 calibration).

The problem of performing T.S. calibrations without an approved procedure appears to be a continuing one, in that Inspection Report Item 78-20-01 reported an item of noncompliance in which a fire protection instrumentation surveillance was performed by an outside vendor without use of a licensee approved procedure. This item was corrected as noted in inspection report 79-14; however, it appears that adequate corrective actions have not been taken in other areas where outside vendors are performing T.S. surveillances and calibrations.

The failure to perform T.S. calibrations in accordance with licensee approved procedures and the failure to maintain records of T.S. calibrations is contrary to Technical Specifications 6.8.1.a and 6.10.1.d and Regulatory Guide 1.33, Appendix A, Paragraph H.2, and is considered a deficiency level item of noncompliance (50-334/80-05-01).

(2) MSP 45.01, Seismic Monitoring Instrument Test, which accomplishes the Semi-annual channel functional test for triaxial time history accelographer (T.S. table 4.3-4.1) was performed on January 17, 1980. The inspector noted that much data was missing from the procedure and a comment was made by a technician, who performed the test, on the procedure critique sheet stating that the procedure was far too extensive than required for a functional check. Inspector review indicated this to be the case. The licensee stated this procedure would be revised to reflect only the required channel functional test. This item is unresolved pending licensee action and subsequent NRC:RI review (50-334/80-05-06).

- (3) T.S. Table 2.2-1, Item 17, specifies that turbine trip/reactor trip setpoint for auto stop oil pressure is set at 45 psig and for turbine stop valve closure is greater than or equal to one precent open. However, T.S. Table 4.3-1, while requiring functional tests of these trip setpoints, does not specifically require calibration of the setpoints. A functional test, OST 1.1.2, was being performed by the licensee for these trips; however, this functional test did not check the set points. The inspector pointed out that Regulatory Guide 1.33, Appendix A, Paragraph H.1 requires calibration of alarm devices, sensors, and protective equipment and that these setpoints were under this requirement and must be calibrated. The licensee concurred and stated that a procedure(s) would be developed to check the accuracy of these setpoints. This item is unresolved pending licensee action and subsequent NRC:RI review (50-334/80-05-07).
- (4) A data point for Source Range Channel Functional Test (OST 1.2.3) performed October 16, 1979 appeared to be out of specification from the procedure acceptance criteria. A review of other data indicates this data point was apparently misrecorded. For the same procedure performed on September 20, 1979 subsequent to a reactor trip, certain steps were omitted for Channel I (N31), as allowed by procedure, because flux levels were too high and immediate restartup was apparently anticipated. Immediate restart did not take place and the remainder of the functional test (for channel II (on 32)) was performed on September 22, 1979. At this point flux levels had decayed sufficiently that the steps, previously ommitted for Channel I, were performed for Channel II. However, these steps were not accomplished for Channel I although conditions were such that the steps could now be accomplished.

Both completed procedures were signed off and accepted by supervisory review. The inspector interviewed the supervisor involved who acknowledged the errors. The errors appear to be isolated cases and no further action is required.

(5) The inspector noted that many calibrations required to be done every 18 months, had exceeded their 18 month interval but were within the 18 month plus 25 percent maximum interval at the time of the inspection or were within the 18 month plus 25 percent at the time the plant entered a mode in which the calibration was not required. In almost all cases recalibration will have to be done prior to restart following the current refueling outage. The inspector expressed a concern about calibration frequency control with so many procedures exceeding their nominal frequency interval, that this may present a problem at a later date. The licensee acknowledged the inspector's comments stating they were aware of the problem and that action was being taken to improve timeliness of calibrations.

- 5. <u>Calibration Required by Technical Specifications of Components and</u> Equipment Associated with Safety Related Systems and/or Functions
 - a. The inspector reviewed, on a sampling basis, the program established for calibration of components associated with safety related systems required by ANSI 18.7-1972. These components are used to monitor system parameters to comply with the safety limits, limiting conditions of operation, and/or meet the surveillance requirements of Technical Specifications.

The following were verified:

- -- Specific requirements have been established for the above calibrations including schedules and frequencies;
- Procedures have been reviewed and approved in accordance with the Technical Specifications, contain acceptance criteria consistent with the Technical Specifications, and contain detailed instruction commensurate with the complexity of the calibration; and,
- Technical content of procedures are adequate to perform a satisfactory calibration.
- b. The following components identified in facility surveillance test procedures were selected at random and the speci ic requirements established for their calibration were verified:
 - -- LCP-13-L1 100C, Refueling Water Storage Tank QS-TK-1 Level Loop L-Q S100C Calibration, Revision 0, March 2, 1979. Data reviewed for test performed on April 25, 1979.

- -- ICP-24-PI-155, Auxilliary Steam Generator Feed Pump (P-2) Discharge Pressure indicator PI-FW155 Calibration Revision 0, April 4, 1979. Data reviewed for test performed on April 25, 1979.
- -- DLC Instrument Calibration Sheet, Refueling Water Storage Tank Level Transmitter LCP-13-QS100D (Referenced Generic procedure CP-006, Level Transmitter (Electronic) Fischer and Porter Company). Data reviewed for test performed on February 27, 1979.
- -- DLC Instrument Calibration Sheet, Chemical Addition Tank Level Calibration, LT-QS-101A (Referenced Generic Procedure CP-006, Level Transmitter (Electronic) Fischer and Porter Company). Data reviewed for test performed in September 17, 1977.
- -- DLC Instrument Calibration Sheet, Chemical Addition Tank Level Calibration LI-QS-101A (Referenced Generic Procedure CP-031, Indicator (Electric) Westinghouse). Data reviewed for test performed August 5, 1977.
- -- DLC Instrument Calibration Sheet, Chemical Addition Tank Level Calibration LSL-QS-101A (Referenced Generic Procedure CO-035, Signal Comparator (Dial Electronic) Westinghouse). Data reviewed for test performed August 5, 1977.
- -- DLC Instrument Calibration Sheet, Safety Injection Pump Discharge Pressure Indication, PI-SI-943 Calibration (Referenced Generic Procedure CP-018, Pressure Gage (Mechanical Indicator) Various Manufacturer). Data reviewed for test performed April 19, 1979.
- -- DLC Instrument Calibration Sheet, Fire Protection System Pressure Gage PI-FP-100 Calibration (Referenced Generic Procedure CP-018, Pressure Gage (Mechanical Indicator) Various Manufacturers). Data reviewed for test performed on October 21, 1978.
- -- DLC Instrument Calibration Sheet, TRB-LM 100-7, Calibration of Reactor Head Storage Area Containment Temperature (Referenced Generic Procedure CA043, Resistance Temperature Device (Platinum), Trinity Inc.). Data reviewed for test performed on October 6, 1978.

- -- DLC Instrument Calibration Sheet, Ohio River Water Temperature Recorder TR-CW102 Calibration (Reference Generic Procedure CP-092, Control Alarm (Electronic) Foxboro). Data reviewed for test performed January 18, 1979.
- -- DLC Instrument Calibration Sheet, Boron Injection Tank Temperature Calibration TICS-SI-934B (Reference Generic Procedure CP-102, Temperature Indicating Controller (Pneumatic) The Foxboro Company). Data reviewed for text performed on May 28, 1978.
- -- DLC Instrument Calibration Sheet, Boric Acid Tank 1B Temperature Indicator Control Switch TICS-CH164 (Referenced Generic Procedure CP-102, Temperature Indicating Controller (Pneumatic) The Foxboro Company). Data reviewed for test performed on May 27, 1978.

c. Findings

(1) During review of Refueling Water Storage Tank (RWST) level instrument calibrations, it was noted that pen and ink changes had been made to "D" loop level instrument calibration data sheets. These changes to the date sheets were a result of a maintenance work request which changed "D" loop instruments to a narrow range indication during November 1977. At this time RWST level indicators were being calibrated by use of DLC Instrument Calibration Data Sheets.

As a result of an ongoing program to issue procedures for calibrations of instruments used to verify T.S. surveillance procedure LCP-13-L100D, "Refueling Water Storage Tank QS-TK-1 Level Loop L-QS100D Calibration", which had been reviewed by the OSC and approved by the Station Superintendent was issued March 2, 1979.

Data sheets in this procedure for the level indicator (LI-QS 100D), the level transmitter (LT-QS100D), and the level recorder (LR-QS100D) did not reflect the existing narrow range level indication, hence, were technically incorrect and could not have been performed as written.

Subsequent to the issuance of procedure LCP-13-L100D, a calibration of level recorder (LR-QS100D) was performed on April 26, 1979. This calibration was performed using the existing DLC Instrument Calibration Sheet rather than the data sheet in the procedure. The data sheet used was correct and, as previously noted, the data sheet in the procedure was not correct. However, had the procedure been used the error in the data sheets would have been observed and a procedure change required.

The licensee stated that the change to the "D" loop indication was only temporary and was being remodified during the current refueling outage; and that this was the reason the procedure was prepared in that manner. The inspector stated that an existing condition for two and one half to three years could not be considered "temporary", that procedures should accurately reflect what is actually present, and that there is no indication personnel preparing the procedure, the OSC which reviewed the procedure, nor the Station Superintendent who approved the procedure were aware of the status of RWST "D" loop level instrumentation.

The issuance of an approved procedure which is technically incorrect and the failure to perform a calibration by use of an existing procedure is contrary to Technical Specification 6.8.1.a and Regulatory Guide 1.33, Paragraph H.1 and is considered an infraction level item of noncompliance (50-334/80-05-02).

6. Calibration and Control of Test Equipment

a. Test Equipment Review

The inspector reviewed the calibration and control of seven pieces of test equipment used as standards in the calibration of components identified in Paragraphs 4, 5, and 7.

Items verified included:

- -- Establishment and maintenance of a master test equipment list;
- -- Establishment and adherence to a calibration schedule;
- -- Maintenance of calibration records identifying standards used which have traceability to the National Bureau of Standards or other testing organization;
- -- Test equipment custody control records;
- -- Storage and labeling of test equipment; and,
- -- Test equipment properly calibrated.

b. Findings

(1) The inspector noted, that for most test equipment reviewed, the calibrations were being performed off site by outside vendors. In each case, the vendor certified that the calibration was correct and standards traceable to National Bureau of Standards were used. In addition, the inspector reviewed data for some test equipment calibrated on site:

Ramp generator (B.V.I.D.-1.123.4) was used in the calibration accomplished by MSP 6.08. Data sheets were reviewed for calibrations performed on July 28, 1979 and February 2, 1979. In neither instance was data recorded documenting proper calibration of the test instrument. For the February 2, 1979 calibration an entry was made on the calibration sheet stating that the instrument had been calibrated; for the July 28, 1979 calibration no entry had been made on the sheet stating that calibration had been accomplished.

1433-T Decade Resistance Box (B.V.I.D. 1.113.5) was used in Calibration accomplished by MSP 6.38. Data sheet was reviewed for calibration accomplished on February 8, 1979. Of the five scales calibrated, data appears to be out of specification on the 0.01-0.09 ohms scale and the 100-1000 ohms scale, yet the instrument was accepted as properly calibrated. This instrument was used for the MSP 6.38 Calibration (Delta T - T avg. Protection) performed on July 3, 1979 which used the 100-1000 ohm scale. The error in calibration on the 100-1000 ohm scale was small and did not appear to significantly affect the MSP 6.38 Calibration. Contributing to this deficiency was the fact that no procedure appeared to have been used for the calibration (none referenced on the data sheet) and the tolerance specified on the data sheet for the 100-1000 ohms scale was confusing.

The failure to properly calibrate test instruments or to properly document and maintain records of their calibration is contrary to Technical Specification 6.8.1.a, Regulatory Guide 1.33 paragraph H.1, and B.V. QA-OP-12, paragraphs 12.2.4 and 12.3 and is considered a deficiency level item of noncompliance (50-334/80-05-03).

7. Inspector Witnessing of Calibration

On February 6, 1980, the inspector witnessed the performance of MSP 10.03, RHR Heat Exchanger Outlet Temperature Channel T-606 Calibration. The calibration was performed and data recorded as required by procedure; and the procedure was adequately detailed to assure performance of satisfactory calibration. No items of noncompliance were identified.

8. Technician Qualification

The inspector reviewed the qualification records of six currently assigned technicians having responsibility for calibration testing of safety related systems and components. This review was performed to verify that the individuals experience level and training were in accordance with ASNI N18.1, "Selection and Training of Nuclear Power Plant Personnel."

No items of noncompliance were identified.

9. Facility Tour

During the inspection, the inspector conducted a tour of the Turbine Building, Control Room, and Instrument Racks. During the tours the inspector observed monitoring instrumentation, housekeeping, controls for Technical Specification compliance, and the Emergency Shutdown Panel. No items of noncompliance were identified.

10. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items or items of noncompliance. Unresolved items identified during this inspection are discussed in Paragraphs 2 and 4.c.(2).

11. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on February 13, 1980. Subsequent telephone discussion concerning inspection findings was held between Mr. J. Werling and Mr. N. Blumberg on February 29, 1980.