

## PUBLIC SERVICE INDIANA

S. W. Shields Senior Vice President -Nuclear Division

December 30, 1980

Mr. Gaston Fiorelli United States Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137

Docket No's: STN50-546 STN50-547

Construction Permit Nos: CPPR-170

SUE, CT: Marble Hill Nuclear Generating Station Units 1 and 2

REFERENCE: Letters from PSI to NRC Region III dated September 24, 1980 and November 7, 1980, amended response to Item of Noncompliance

Dear Mr. Fiorelli:

Below is the corrective action taken to resolve Item of Noncompliance 80-28-01.

## Corrective Action Taken and Results Achieved

Corrective Action Request Number PC-0490 was initiated on July 9, 1980 to document that, contrary to the requirements of ANSI N45.2 Section 13 which states in part "measures to ensure that tools, gauges, instruments and other inspection, measuring and testing equipment and devices used in activities affecting quality are of proper range, type and accuracy to verify conformance to established requirements", had not been instituted, in that no program for monitoring of purge pressure gauges on items requiring inert gas blankets existed.

Calibrated gauges shall be installed on equipment as required by the Storage and Maintenance Instructions.

> Note: Storage and Maintenance Instructions are prepared and/or approved by PSI for implementation by site contractors.

For Storage and Maintenance Instructions specifying purge limits only, calibrated gauges are not required. The indicator gauges must, however, be verified against a calibrated gauge at least every six months.

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3. If removal of the indicator gauge would result in loss of purge and have possible detrimental effect on the equipment, verification against a calibrated gauge is not required, however, written approval is necessary from PSI.

## Corrective Action Taken To Prevent Recurrence

Project Management Procedure (PMP) 6.03 was revised to require the following:

 If the equipment arrives with a nitrogen purge, assure pressure gauges are installed and a positive purge pressure is maintained in accordance with the applicable Storage and Maintenance Instruction.

Check daily for the first five working days in accordance with applicable Storage and Maintenance Instructions thereafter.

 Gauges shall be installed on equipment in accordance with the applicable Storage and Maintenance Instruction. Where calibrated gauges are not required, the gauges shall be verified against a calibrated gauge upon receipt of the equipment and, as a minimum, check every six months thereafter.

If removal of a gauge could result in an immediate loss of purge and/or possible detrimental effect on the equipment, prior written approval and subsequent actions to be taken shall be obtained from the Materials and Project Engineering Sections.

 If during monitoring, inspection, maintenance or construction activities, it is determined that a purge is lost, a Nonconformance Report shall be initiated for the purpose of Documentation and obtaining Corrective Action.

In addition each Organization responsible for Storage and Maintenance activities was given direction to include these requirements into their respective programs.

Fourteen (14) Storage and Maintenance Instructions (which includes a total of one hundred and twelve (112) pieces of equipment, approximately 222 gauges) were revised to include purge requirements, required pressure ranges, frequency of monitoring and the installation of calibrated gauges where the manufacturers specify the use of calibrated gauges.

PUBLIC SERVICE December 30, 1980 -3-INDIANA Mr. Fiorelli The changes as stated should provide a satisfactory resolution to the item of noncompliance. The above corrective action has been implemented. JK/kdt cc: J.G. Keppler E.R. Schweibinz J.J. Harrison QA Records 02 File