

Richard A. Uderitz  
Vice President -  
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 935-6010

November 19, 1982

Mr. Ronald C. Haynes, Regional Administrator  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Haynes:

NRC COMBINED INSPECTION 50-272/82-22, 50-311/82-21  
SALEM GENERATING STATION  
UNITS NO. 1 AND 2  
AUGUST 23 THRU AUGUST 27, 1982

We have reviewed the items of violation which were identified in the subject inspection and described in Appendix A of your letter dated October 19, 1982. The following are our responses to those identified items:

ITEMS OF VIOLATION

ITEM A

10CFR50, Appendix B, Criterion XII, "Control of Measuring and Test Equipment" states, "Measures shall be established to assure that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Licensee Administrative Procedure (AP)-22, Measuring and Test Equipment Calibration Program, Revision 5, October 19, 1981 specifies that all measuring and test equipment shall be calibrated, shall be accounted for, shall be inventoried, and shall be properly stored:

Contrary to the above:

1. On August 27, 1982, multi-ampere tester M-137 was observed to have a calibration sticker with a calibration date of March 23, 1982. However, the calibration data sheet for tester M-137 dated March 23, 1982, showed that the test was found and was left in an out-of-calibration condition.

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ITEM A (continued)

2. On August 27, 1982, test instruments M-76 and M-184 could not be accounted for. A licensee representative could not physically locate the instruments and there was no documentation available to determine the whereabouts of the instruments.
3. On August 27, 1982, there was no record of any 1981 or 1982 physical inventories of measuring and test equipment in the maintenance department.
4. On August 27, 1982, multi-ampere tester M-137 was being stored in a storage room in B Building accessible to any licensee personnel and was stored in unsuitable, inadequate housekeeping conditions.

REPLY TO ITEM A

The root cause of the problem was that the responsibility for calibration was assigned as a collateral duty, and therefore received a low priority in relation to other maintenance tasks.

The following corrective actions have been taken in response to the listed items:

1. Meter M-137 has been properly recalibrated.
2. Meters M-76 and M-184 have been accounted for.
3. A physical inventory has been completed.
4. The inadequate housekeeping conditions were corrected and steps will be taken to create a new locked area for test equipment.

In order to prevent recurrence, the instrument calibration tracking responsibilities will be reassigned to a staff supervisor for special projects. This program will be accomplished in conjunction with the calibrated device program, and should be implemented by July 1, 1983.

ITEM B

10CFR50, Appendix B, Criterion XVI, "Corrective Action", states in part "Measures shall be established to assure that conditions adverse to quality, such as...defective material and equipment and nonconformances are promptly identified and corrected."

The Salem Quality Assurance Manual commits Public Service Electric and Gas Company to meet ANSI N18.7-1976. ANSI N18.7-1976, paragraph 5.2.16, Measuring and Test Equipment, states in part: "When calibration, testing, or other measuring devices are found out of calibration, an evaluation shall be made and documented concerning the validity of previous tests and the acceptability of devices previously tested from the time of the previous calibration."

Contrary to the above:

1. Decade box standard PD-193 was found to be out of calibration on January 26, 1981. The evaluation completed on March 16, 1981 did not address the validity of previous calibrations performed on 27 pieces of measuring and test equipment, which were subsequently used to calibrate safety-related equipment. This represents inadequate corrective action.
2. Measuring instruments PD-106 (Heise gauge) and PD-489 (Fluke multimeter) were found to be out of calibration on June 2, 1981 and September 10, 1981, respectively. The out of calibration conditions were documented on August 6, 1982 on Deficiency Reports (DR's) 82-1556 and 82-1553, respectively. The evaluations performed on the DR's did not determine the validity of previous tests. This represents untimely and inadequate corrective action.

REPLY TO ITEM B

1. An evaluation has been performed to determine what effect the out of calibration condition of decade box standard PD-193 had on the 27 pieces of measuring and test equipment it was used to calibrate. It has been determined that the amount of calibration error present in the standard would not have resulted in an improper calibration of the measuring and test equipment.

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REPLY TO ITEM B (continued)

Subsequent evaluations required due to out of calibration standards will consist of a determination of the effect that the standard may have had on any piece of measuring and test equipment it was used to calibrate. If the effect is determined to be significant, the measuring and test equipment that had been calibrated with the standard will be evaluated as to the validity of the tests performed with the equipment since it was last calibrated. This corrective step is fully instituted at this time.

2. At the time of the finding, the evaluations to determine the validity of previous tests, although overdue, had been completed, and were valid at the time. In order to prevent recurrence the following steps will be initiated:
  - a. There will be an expanded effort to eliminate the back-log of open measuring and test equipment evaluations. Full compliance will be achieved by March 1, 1983.
  - b. Additions to the supervisory force will permit a shift of responsibilities which will enable more time to be spent on the measuring and test equipment program. This action is fully instituted at this time.
  - c. New methods have been initiated to provide for more timely evaluation of out of calibration measuring and test equipment. This action is fully instituted at this time.

Sincerely,




CC: Director; Office of Inspection and Enforcement  
Nuclear Regulatory Commission  
Washington, D.C. 20555

NRC Senior Resident Inspector - Salem

STATE OF NEW JERSEY )  
 ) SS. COUNTY OF SALEM  
COUNTY OF SALEM

RICHARD A. UDERITZ, being duly sworn according to law deposes  
and says:

I am a Vice President of Public Service Electric and Gas  
Company, and as such, I find the matters set forth in our  
response dated November 19, 1982, to the NRC's combined  
inspection report 50-272/82 and 50-311/82-21 are true to the  
best of my knowledge information and belief.

  
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RICHARD A. UDERITZ

Subscribed and sworn to before me  
this 19<sup>TH</sup> day of NOVEMBER, 1982

  
\_\_\_\_\_  
Notary Public of New Jersey

RUDOLPH J. von FISCHER, JR.  
Notary Public of New Jersey  
My Commission Expires Sept. 10, 1988

My Commission expires on \_\_\_\_\_