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C321-92-2062
February 21, 1992

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

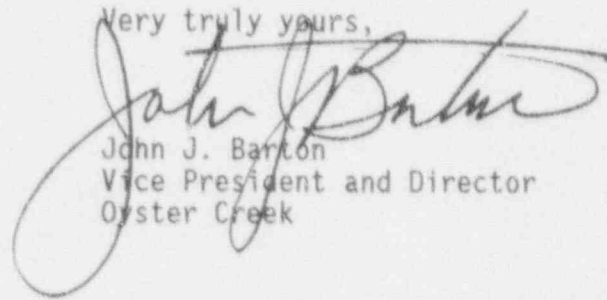
Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 91-37
Reply to a Notice of Violation

In accordance with 2.201, the enclosed provides GPU Nuclear's response to the Notice of Violation identified in NRC's Inspection Report 50-219/91-01.

An extension of the due date was discussed with Regional Management on 2/14/92 and was granted until 2/21/92.

Should you have any questions, please contact Brenda DeMerchant, Oyster Creek Licensing Engineer at 609-971-4642.

Very truly yours,



John J. Barton
Vice President and Director
Oyster Creek

JJB/BDEM:jc

cc: Administrator, Region 1
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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Violation:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained that meet or exceed the recommendations of Regulatory Guide (Reg Guide) 1.33, revision 2, Quality Assurance Program Requirements (Operation). Reg Guide 1.33, Appendix A, paragraph 8.a, requires that procedures should be provided to ensure that tools, gauges, instruments, controls and other measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy. 10 CFR 50, Appendix B, Criterion XII, "Control of Measuring and Test Equipment," (M&TE) requires that 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. Station procedure A100-ADM-3053.01, revision 3, "Calibration and Control of Maintenance, Test and Inspection Tools, Gauges, and Instruments," paragraph 6.2.1, requires that only current calibrated equipment shall be used and all transactions shall be documented on the Test Equipment Usage Record.

Contrary to the above, the requirements to record each use of M&TE and to ensure only calibrated equipment was used was not adhered to, in that, on November 17, 1990 the M&TE (Alber Engineering, Inc., Model BCT-1000 battery tester) used during post maintenance testing of the number 2 emergency diesel generator was past its calibration due date of October 18, 1990. In addition, neither the November 17, 1990, nor the December 6, 1990 uses of the BCT-1000 were documented in the Test Equipment Usage Record. Review of the Test Equipment Usage Records by the inspector and by GPU Nuclear Quality Assurance personnel indicate the documentation of M&TE use during maintenance, surveillance, and other licensee activities continues to be contrary to the above requirements.

This is a severity level IV violation (Supplement I).

Response:

GPUN concurs with the violation as stated.

The reasons for the violation are as follows:

Physical control of the BCT-1000 was not maintained by the Calibration Laboratory because of the size of the instrument and the limited storage area. Whenever the BCT-1000 was to be used, the electrical department was to provide the appropriate date to be documented on the "Test Equipment Usage Record". However, this was not done in all cases.

After the incident of December 6, 1990, the BCT-1000 was field calibrated on the same day and found to be in tolerance. The components of the BCT-1000 which require calibration are now stored in the Calibration Laboratory.

The following corrective actions have been initiated:

Procedure AOC0-1220-08 entitled "Job Order" will be revised to require the Job Supervisor to ensure M&TE use is recorded in the test equipment usage record prior to the job closeout. This practice has been in place since the first week of December, 1991. This revision will be completed by April 30, 1992.

Procedure A100-ADM-3035.01 will be revised to include "M&TE Usage" forms as an exhibit and to require job order packages be presented to the Cal Lab/Tool Room M&TE issuing personnel at the time instruments are issued to ensure correct job numbers are recorded when signing out equipment. This revision will be completed by March 31, 1992.

Changes to the computer based work management system (GMS2) are planned which will allow the Calibration Laboratory Supervisor to determine all job orders on which M&TE was used. These enhancements to GMS2 will be completed by end of the fourth quarter of 1992.

In addition, the response to Quality Deficiency Report 91-068 was issued as required reading to all Maintenance supervisors, planners, and others who control work utilizing M&TE, and the required reading has been completed.

Full compliance was established on December 9, 1991, when work packages were required to be presented to the Cal Lab/Tool Room M&TE issuing personnel prior to signing out equipment.