## DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.C. 28242

HAL B. TUGKER VICE PRESIDENT NUCLEAR PEODUCTION

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TELEPHONE (704) 373-4531

Dr. J. Nelson Grace, Regional Administrator U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

Subject: Oconee Nuclear Station IE Inspection Report 50-269/85-04 50-270/85-04 50-287/85-04

Dear Sir:

In response to your letter dated March 15, 1985 which transmitted the subject Inspection Report, the attached response to the cited items of non-compliance is provided.

Very truly yours,

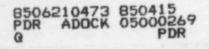
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Attachment

cc: Mr. J. C. Bryant NRC Resident Inspector Oconee Nuclear Station



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## Violation

10 CFR 50, Appendix B, Criterion II requires that activities affecting quality shall be accomplished under suitably controlled conditions, including suitable environmental conditions for accomplishing the activity. Controlled procedures for the calibration of Fluke 8100A and 8600A digital Multimeters (IP/0/B/1602/2, January 16, 1985, and IP/0/B/1602/4, December 5, 1984, respectively) prescribe specific temperature and humidity test conditions.

Contrary to the above, neither temperature nor humidity was routinely checked or recorded for calibration of digital multimeters in the I&E shop.

This is a Severity Level IV violation (Supplement I).

## Resposne

1) Admission or denial of the alleged violation:

This violation is admitted to the extent that neither temperature nor humidity was routinely verified and recorded for calibration of digital multimeters in the I&E shop. However, as discussed in (2) below, there were mitigating circumstances.

2) Reasons for the violation:

The procedures cited in the violation did not specifically require that specific environmental conditions be checked, recorded, or followed during calibration activities for the noted multimeters. The procedures did note verbatim the manufacturer's recommendations that the instruments "should" be calibrated within specific temperature and humidity conditions. These recommendations were interpreted as such, not as requirements. This interpretation was consistent with the definitions of "should" and "shall" in Duke's Administrative Policy Manual for Nuclear Stations. As noted in the Inspection Report Details, Duke personnel are confident that past calibrations were performed within the recommended environmental conditions.

3) Corrective steps which have been taken and the results achieved:

Signs have been posted in the calibration shop noting limiting environmental conditions for calibration of Fluke multimeters. The appropriate procedures were revised (effective February 19, 1985) to allow calibration only within the recommended environmental limits and to require documentation of temperature and humidity conditions on the procedure data sheets.

4) Corrective steps which will be taken to avoid further violations:

No futher corrective actions are necessary.

5) Date when full compliance will be achieved:

All corrective actions were completed by February 19, 1985.