



ATOMIC POWER COMPANY •

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March 4, 1986
MN-86-38

GDW-86-60

Region I
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Dr. Thomas E. Murley, Regional Administrator

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) USNRC Letter to MYAPCo dated February 4, 1986 - Inspection Report No. 50-309/85-34

Subject: Response to Notice of Violation in Inspection Report 85-34

Gentlemen:

In Reference (b), you transmitted to Maine Yankee a Notice of Violation which included four violations. Of the discrepancies noted, only two matters were unresolved at the end of the inspection and require a formal response.

Below we have restated the violations and our response including necessary corrective actions.

Violation A

10 CFR 50, Appendix B, Criterion XII requires that measures shall be established to assure measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted to maintain accuracy within necessary limits.

Maine Yankee Operational Quality Assurance Program, Section XII, "Control of Measuring and Test Equipment," Revision 2, and Maine Yankee Procedure O-06-5, "Measuring and Test Equipment," Revision 2, require similar control mechanisms for measuring and test equipment (M&TE).

Contrary to the above, (1) calibration procedures for outside micrometers and torque wrenches and calibration cross-check procedures for dead weight testers were not adequate in that these procedures did not designate the calibration points to be checked, (2) evaluations were not conducted to verify the validity of tests performed with pieces of M&TE that were later discovered out of tolerance, and (3) M&TE usage was not always identified on usage cards as required by licensee administrative procedures.

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This is considered to be a Sererity Level V violation. Your response to this item need only address corrective action for item (3), M&TE usage cards, since corrective actions for the other items have been reviewed and found to be adequate.

Maine Yankee Response

As a result of this finding, Maine Yankee carefully reviewed the applicable Quality Assurance Procedure (0-06-5) to determine whether the direction provided was clear and unambiguous. We found that the requirement to log usage of measuring and test equipment was properly stated and that the violation was the result of a failure to follow a written procedure under certain specific circumstances.

The circumstances developed when measuring and test equipment was used by other than Instrumentation and Controls personnel to calibrate equipment belonging to another section. The failure to log the individual uses on the primary devices usage card gave rise to the finding.

As of February 27, 1986, Maine Yankee has instituted the use of a special log sheet to be used under the conditions described. Each use of a device will thus be logged on the usage cards.

Further, the Maintenance Manager has requested increased scrutiny by Maine Yankee's Quality Assurance Department for the remainder of this calendar year to assure that this new administrative control provides proper documentation of the use as well as the issuance of measuring and test equipment.

Finally, an additional mechanism exists for tracing measuring and test equipment usage at Maine Yankee. In procedures which call for the use of a calibrated device, a requirement to note the device number and calibration date is included.

Violation C

10 CFR 50, Appendix B, Criteria VI, requires that measures be established to control the issuance of documents such as instructions, procedures and drawings including changes thereto which prescribe all activities affecting quality.

Maine Yankee Procedures 0-01-2, "Drawing Control," and 17-22-3, "Drawing Update," require (1) that uncontrolled drawings be destroyed upon completion of an activity, or that uncontrolled drawings be periodically reverified if they are used for a prolonged period of time, and (2) that controlled drawings be stamped to reflect outstanding drawing changes due to completed design changes.

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Contrary to the above, (1) two sets of uncontrolled drawings were kept in the control room along with controlled drawings, and were not verified as required, and (2) controlled drawings reviewed at four locations did not reflect the same status of outstanding engineering design change requests (EDCRs).

This is considered to be a Level V violation. Your response to this item need only address item (1), uncontrolled drawings, as corrective actions for item (2) have been reviewed and found to be adequate.

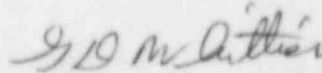
Maine Yankee Response

The uncontrolled drawings noted in this violation have been removed from the control room. All operations personnel were reminded that such drawings are not permitted in the control room.

We trust that this response is satisfactory. If you have any questions, please feel free to call me.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



G. D. Whittier, Manager
Nuclear Engineering & Licensing

GDW/bjp

cc: Mr. Ashok C. Thadani
Mr. Cornelius F. Holden
Mr. Pat Sears