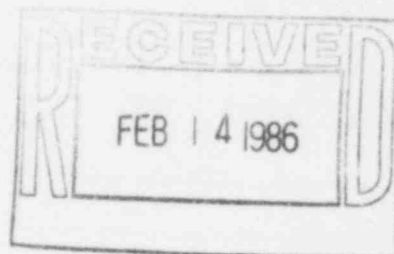




CNSS867102

February 10, 1986



Mr. J. E. Gagliardo, Chief
Reactor Projects Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to Inspection Report 50-298/85-32

Dear Mr. Gagliardo:

This letter is written in response to your letter dated January 13, 1986, transmitting Inspection Report 50-298/85-32. Therein you indicated that one of our activities was in violation of NRC requirements.

Following is a statement of the violation and our response in accordance with 10CFR2.201:

Statement of Violation

Criterion V of 10CFR Part 50, Appendix B, and the licensee's approved quality assurance program require that activities affecting quality be performed in accordance with approved procedures, instructions, or drawings.

Quality Assurance Program for Operation Policy Document, Revision 2, dated April 29, 1985, paragraph 2.12 states, in part, "Procedures shall define the requirements of inspection, maintenance, repair, and calibration of all tools, gauges, instruments, and other measuring and testing devices which are used in connection with activities which affect quality of safety-related equipment..."

Contrary to the above, procedures did not define the requirements of calibration of certain gauges used in connection with safety-related activities. It was found that pressure gauges used for local leak rate testing to Technical Specifications requirements 4.7.A.2.f and identified as LLRT-2 through 7, although checked, were not addressed in procedures which define such requirements as tolerances, frequency, standards, and documentation.

This is a Severity Level IV Violation (Supplement I.D.) (50-298/8532-01).

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Reason for Violation

In reviewing the root cause of this violation, it was determined that measuring and test equipment which is frequently used in the usual course of station operation and maintenance is adequately controlled by station procedures. However, it was found that some measuring and test equipment was being maintained by the CNS Engineering Department for use by engineering personnel in troubleshooting and specialized testing activities. The pressure gauges noted in the Statement of Violation fall within this group. Other examples are the helium leak detection instrument which is used to find main condenser in-leakage and the Rebar Locator which is used to locate rebar imbedded in concrete. As a result of this practice, calibration requirements were often left to engineering judgement and were not always controlled by a formal procedure.

Corrective Steps Which Have Been Taken and the Results Achieved.

For the pressure gauges described in the Notice of Violation, procedure revisions were initiated to correct the noted deficiencies. These revisions will properly define the requirements of calibration of primary containment local leak test pressure gauges.

Corrective Steps Which Will Be Taken to Avoid Further Violations.

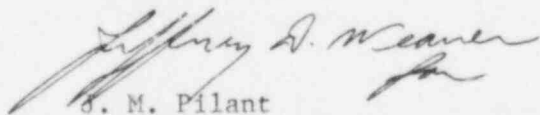
Station procedures will be revised to require that all measuring and test equipment be turned over to the appropriate maintenance department and placed under formal procedural control.

Date When Full Compliance Will Be Achieved.

Full compliance will be achieved by August 1, 1986.

Should you have any questions regarding this response, please contact me.

Sincerely,



S. M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP:RCD:ss