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10 CFR 50.54(a)(3)

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50-364

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

Joseph M. Farley Nuclear Plant  
Final Safety Analysis Report  
Quality Assurance Program Changes  
Instrumentation Calibration Labeling

Ladies and Gentlemen:

Pursuant to 10CFR50.54(a)(3), attached is a change to the Farley Nuclear Plant (FNP) Final Safety Analysis Report (FSAR) Quality Assurance (QA) Program Description for your review and approval. The FNP FSAR QA Program description is located in Section 17.2 of the FNP FSAR. This change is submitted for approval prior to implementation as specified for a reduction in commitment.

The FSAR QA program description is being revised to reduce the requirement to attach calibration labels or tags at FNP. FNP is currently committed to ANSI N45.2.4, "Installation, Inspection, and Testing Requirements for Instrumentation and Electrical Equipment During The Construction of Nuclear Power Generating Stations." Section 6.2 specifies in part, "Items requiring calibration shall be tagged or labeled on completion indicating date of calibration and identity of person that performed the calibration." FNP proposes an alternative to the requirement to attach a label or tag "indicating the date of calibration and identity of person that performed the calibration." The proposed alternative is to maintain a log that includes calibration date and calibration due date for each instrument requiring calibration, in lieu of the presently used calibration stickers. Plant documents provide the identity of the person performing the calibration.

If there are any questions, please advise.

Respectfully submitted,

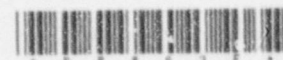
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- Attachments: 1. 10CFR50.54(a)(3) Evaluation  
2. Marked-Up FSAR pages

cc: Mr. L. A. Reyes, Region II Administrator  
Mr. J. I. Zimmerman, NRR Project Manager  
Mr. T. M. Ross, Plant Sr. Resident Inspector



**ATTACHMENT 1**

**Final Safety Analysis Report  
Quality Assurance Program Changes  
10CFR50.54(a)(3) Evaluation**

## ATTACHMENT 1

### Final Safety Analysis Report Quality Assurance Program Changes 10CFR50.54(a)(3) Evaluation

#### Affected Pages

FSAR page 17.2.27

#### Description of the Change

This proposed change will affect the FNP Final Safety Analysis Report (FSAR) chapter 17.2 OPERATIONS QUALITY ASSURANCE PROGRAM and will affect the method of documentation of calibration data for test instruments and other components. This proposed change will be reflected in FSAR section 17.2.11 "Test Control." The discussion for Regulatory Guide 1.30 will make reference to an exception being taken to ANSI N45.2.4 paragraph 6.2.1.

#### Reason for the Change

In the current FSAR QA program description, SNC is committed to Regulatory Guide 1.30 dated August 11, 1972 that in turn references ANSI N45.2.4-1972. This standard specifies that items requiring calibration be tagged or labeled upon completion indicating date of calibration and identity of person performing the calibration. In practice, FNP personnel affix a calibration sticker directly to the item containing the required information. These stickers tend to obscure portions of meters and are difficult to remove. In addition, problems with stickers becoming detached from the calibrated item have occurred. As an alternative FNP proposes to maintain a log or database containing the date of calibration specified by ANSI N45.2.4-1972. The identity of the person performing the calibration is available in retained test procedure records.

#### Basis for the Acceptability of the Change

The data as required by ANSI N45.2-1972 will be available and a mechanism will be in place to ensure that required calibrations of instruments are current, prior to use for a test. The identity of performing personnel will be available if needed. Personnel accountability for proper performance of the calibration will not be diminished since that information will continue to be available. The ability of station personnel to determine all information that is currently provided on calibration stickers will not be diminished. This change does not lessen the documentation requirements of ANSI N45.2-1972, but simply provides an alternate method for retaining that information.

This change will provide the following benefits. Meter faces will not be obscured, and problems with lost or illegible calibration stickers will be avoided. A log or database will be available for personnel to readily determine the calibration status of items.

10 CFR Part 50 Appendix B criteria will continue to be satisfied with this change implemented. This change is consistent with methods used at Hatch and Vogtle.

**ATTACHMENT 2**

FSAR Mark-Up Page

Results of safety-related tests will identify the test data, data recorder, acceptability, and/or any deficiencies noted. Any noted deficiencies will be resolved with such actions documented and included with original test results.

Operations activities involved with the installation, inspection, and testing of instrumentation, electrical equipment, mechanical equipment, and systems will be accomplished in accordance with Regulatory Guide 1.30, dated August 11, 1972, Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electrical Equipment (endorses ANSI N45.2.4-1972), and with ANSI N45.2.8 (1974), Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants. With the exceptions listed below, Southern Nuclear Operating Company complies with regulatory Guide 1.30 as addressed in FSAR, section 17.2. Exception is taken to ANSI N45.2.4 (1972) "Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction Phase of Nuclear Power Generating Stations", section 6.2.1, which states, in part: "Items requiring calibration shall be tagged or labeled on completion indicating date of calibration and identity of person that performed the calibration." Installed process instruments at Plant Farley are identified by unique instrument numbers. These instrument numbers are traceable to calibration schedules and records. These instruments are not tagged or labeled with calibration data. Listed below is a cross-reference between sections of these standards and the FSAR subsections that discuss compliance with these requirements:

ANSI N45.2.4 SectionFSAR Subsection

1.1	NA
1.2	NA
1.3	13.5.3, 17.2.1 (APC PGS Department)
1.4	NA
1.5	NA
2.1	13.5.3
2.2	17.2.2, 17.2.3
2.3	17.2.13, 17.2.1 (APC PGS Department)
2.4	17.2.10, 17.2.11
2.5	17.2.12
2.6	17.2.16
3	17.2.7, 17.2.8, 17.2.10, 17.2.13
4	17.2.10, 17.2.11
5.1	13.5.3, 17.2.10, 17.2.13
5.2	17.2.11