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JOSEPH A. TIERNAN  
VICE PRESIDENT  
NUCLEAR ENERGY

September 25, 1986

U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Docket Nos. 50-317  
50-318  
License Nos. DPR-53  
DPR-69

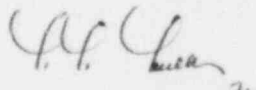
ATTENTION: Mr. Stewart D. Ebnetter, Director  
Division of Reactor Safety

Gentlemen:

This refers to Inspection Report 50-317/86-10, 50-318/86-10; which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item noted in your letter of August 12, 1986.

Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,



J. A. Tiernan

JAT/SRC/gla

Enclosure

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
S. A. McNeil, NRC  
T. Foley, NRC

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ENCLOSURE (1)

**REPLY TO APPENDIX A OF NRC INSPECTION  
REPORT 50-317/86-10; 50-318/86-10**

We have reviewed the circumstances that led to the apparent violation of Technical Specification 6.8.1 referred to by the subject inspection report. These events were reviewed individually as well as generically to determine the appropriate corrective measures. Those events which involved a failure to follow procedure are being addressed individually because of their somewhat unique circumstances and lack of commonality. However, strong measures will be taken in the future if similar events continue to occur. Two examples of the violation did disclose procedure weaknesses. Programmatic measures are being taken as described below.

In response to the first example cited in Appendix A, we are making a programmatic change to the procedures administratively maintaining the environmentally qualified (EQ) equipment to explicitly highlight the EQ requirements for the equipment items identified. These changes will be accomplished by October 27, 1986. All Technicians have been retrained on the EQ requirements contained in Functional Test Instruction (FTI)-104. They have been instructed to place the Qualification Number in the remarks section of the FTI data sheet. Additionally, the Technicians have been instructed to perform this same action on all applicable functional tests. The Technicians have also been given further training that emphasizes post-maintenance documentation especially for EQ maintenance actions.

Regarding example No. 2, we believe that the maintenance on #11 Steam Generator level transmitter 1-LT-1124C was conducted properly, however, we agree that the item was not correctly identified in the Qualification Maintenance Program. Accordingly, we will revise Calvert Cliffs Instruction 208 and the IE Equipment List (contained in the Q-List) by December 31, 1986, to ensure that the transmitters are properly identified.

The third example indicates an apparent failure to submit Non-Conformance Reports (NCR) on three occasions for Digital Volt Meters (DVM) that were found to be out-of-calibration. We reviewed the calibration sheets for Item #8731 DVM and Item #10273 DVM, and found NCRs issued for each on June 27, 1986. In addition, we have reviewed the calibration sheet for Item #10278 DVM and we have found no problems with the data sheet. We feel that no further action is warranted in this area. From a programmatic standpoint, we have instructed our Test Equipment Technicians to assure that they take "as-found" readings on the test equipment prior to making any adjustments.

Concerning the fourth example, our Electrical & Controls (E&C) Technicians have been instructed to comply with all written instructions contained in plant maintenance and surveillance test procedures. Our follow-up observations and inspections indicate that procedures are currently being followed correctly, however, if deficiencies are detected in the future appropriate personnel actions will be executed by management. We believe that the observed instance referred to in the subject inspection report was an isolated case.

ENCLOSURE (1)

**REPLY TO APPENDIX A OF NRC INSPECTION  
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With respect to example five, an E&C Section Standard Practice has been implemented to supplement Quality Assurance Procedure No. 7. This standard practice specifies the proper method for making procedural changes. Additionally, all E&C Technicians have been instructed on this practice.

SECRET

PLANNING AND ECONOMIC DEVELOPMENT  
DEPARTMENT OF THE INTERIOR

1. The purpose of this document is to provide a summary of the findings of the study conducted by the Planning and Economic Development Department of the Interior. The study was conducted in order to determine the impact of the proposed project on the local economy and the environment.

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