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 50-402 Shearon Harris Nuclear Power Plant, Unit 3, Carolina 05000403
 50-403 Shearon Harris Nuclear Power Plant, Unit 4, Carolina 05000403

AUTH. NAME: UTLEY, E.E. AUTHOR AFFILIATION: Carolina Power & Light Co.
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Submits positions to Reg. Guide 1.58, Revision 1 & Reg. Guide 1.146, Revision 0 re personnel qualification. Util will comply w/both reg guides w/exceptions listed in attachments. Positions will be reflected in first amend to FSAR.

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Carolina Power & Light Company

August 4, 1981

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Mr. Darrell G. Eisenhut, Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D. C. 20555



BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NOS. 1, 2, 3, AND 4
DOCKET NOS. 50-400, 50-401, 50-402, AND 50-403
QUALIFICATION OF INSPECTION, EXAMINATION,
AND TESTING AND AUDIT PERSONNEL

Dear Mr. Eisenhut:

As requested by your letter dated May 4, 1981, Carolina Power & Light Company (CP&L) submits the attached positions to Regulatory Guide 1.58, Revision 1, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel," and Regulatory Guide 1.146, Revision 0, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants." CP&L will comply with both Regulatory Guides with the exceptions as listed in the attachments.

The attached positions concerning these Regulatory Guides supercede any previous positions on these items supplied by CP&L. These positions will be reflected for the Shearon Harris Nuclear Power Plant, which is presently under construction, in the first amendment to the Final Safety Analysis Report (FSAR). This letter constitutes documentation of CP&L's positions on these Regulatory Guides for CP&L's operating plants.

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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If you have any questions on this subject, please contact our staff.

Yours very truly,

A handwritten signature in dark ink, appearing to read "E. E. Utley", is written over a diagonal line that crosses through the signature.

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

JHE/cr (M#9)

Attachments

cc: J. D. Neighbors (NRC)
J. Van Vliet (NRC)
E. Licitra (NRC)

CP&L POSITION ON REGULATORY GUIDE 1.58
REVISION 1, "QUALIFICATION OF NUCLEAR POWER PLANT
INSPECTION, EXAMINATION, AND TESTING PERSONNEL"

Carolina Power & Light Company shall comply with NRC Regulatory Guide 1.58, Revision 1, which endorses ANSI N45.2.6-1978, with the following exceptions:

- 1) With regard to Section 1.2 of ANSI N45.2.6-1978 titled Applicability: CP&L elects not to apply the requirements of this guide to those personnel who are involved in the daily operations of surveillance, maintenance, and certain technical and support services whose qualifications are controlled by Section 6.3 of the Technical Specifications for the SHNPP Project, H. B. Robinson Unit No. 2, and Brunswick Steam Electric Plant, or are controlled by other QA Program commitment requirements. Only personnel in the following listed categories will be required to meet ANSI N45.2.6-1978 requirements: (1) Nondestructive examination (NDE) personnel; (2) Construction QA/QC inspection personnel; and (3) Operating plant QA/QC inspection personnel.
- 2) The fourth paragraph of Section 1.2 requires that the Standard be imposed on personnel other than CP&L employees. The applicability of the Standard to suppliers and contractors will be documented and applied, as appropriate, in the procurement documents for such suppliers and contractors.
- 3) With regard to Section 1.4 of ANSI N45.2.6-1978 titled Definitions: Definitions in this Standard which are not included in ANSI N45.2.10 will be used; all definitions which are included in ANSI N45.2.10 will be used as clarified in CP&L's commitment to Regulatory Guide 1.74.
- 4) With regard to Section 2.5 of ANSI N45.2.6-1978 titled Physical: CP&L will implement the requirements of this Section with the stipulation that, where no special physical characteristics are required, none will be specified. The converse is also true: if no special physical requirements are stipulated by CP&L, none are considered necessary. CP&L employees receive an initial physical examination to assure satisfactory physical condition; however, only the following listed personnel will receive an annual examination: (1) NDE personnel; (2) construction QA/QC inspection personnel; and (3) Operating plant QA/QC inspection personnel. This annual examination shall consist of the near visual acuity using the standard Jaeger's type chart or equivalent test.

- 5) With regard to Section 3 of ANSI N45.2.6-1978 titled Qualifications: Only personnel performing NDE (such as LP, MT, UT, & RT) will be grouped in levels of capability and certified as such. QA/QC inspection personnel will be certified for inspection, review and evaluation of inspection data, and reporting of inspection and test results.
- 6) With regard to section 3.5 of ANSI N45.2.6-1978 titled Education & Experience Recommendations: CP&L will certify individual inspectors through training and experience to requirements appropriate to the specific assignment; however, except for NDE, personnel will not be classified by levels of capability. The training and experience requirements will be directed toward qualifying personnel for specific inspection and testing operations.

CP&L POSITION ON REGULATORY GUIDE
1.146, REVISION 0, "QUALIFICATION OF QUALITY
ASSURANCE PROGRAM AUDIT PERSONNEL FOR
NUCLEAR POWER PLANTS"

Carolina Power & Light Company shall comply with NRC Regulatory Guide 1.146, Revision 0, which endorses ANSI N45.2.23-1978, with the following exceptions:

- 1) With regard to Section 1.4 of ANSI N45.2.23-1978 titled Definitions: Definitions in this Standard which are not included in ANSI N45.2.10 will be used; "AUDIT" which is included in ANSI N45.2.10 will be used as clarified in CP&L's commitment to Regulatory Guide 1.74.
- 2) With respect to Section 2.2 of ANSI N45.2.23-1978 titled Qualification of Auditors: Subsection 2.2.1 references an ANSI B45.2 which will be assumed to be N45.2. CP&L will comply with an alternate subsection 2.2.1 which reads:

Orientation to provide a working knowledge and understanding of the CP&L Quality Assurance Program, including the Regulatory Guides and ANSI standards included in the Program, and CP&L's procedures for performing audits and reporting results.
- 3) With respect to Section 3.2 of ANSI N45.2.23-1978 titled Maintenance of Proficiency: CP&L will comply with the requirements of this Section by defining "annual assessment" as one which takes place every 12 months, plus or minus three months, and which will use the initial date of certification for determining when annual assessment is due.
- 4) With respect to Section 4.1 of ANSI N45.2.23-1978 titled Organizational Responsibility: CP&L will comply with this Section with the substitution of the following sentence in place of the last sentence in the Section.

The Manager of Quality Assurance, Principal QA Specialist - Performance Evaluation, or Lead Auditor shall, prior to commencing the audit, assign personnel who collectively have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited.

- 5) With respect to the Section 5.3 of ANSI N45.2.23-1978 titled Updating of Lead Auditors' Records: CP&L will substitute the following sentence for this Section:

Records for each Lead Auditor shall be maintained and updated during the annual management assessment as defined in Section 3.2 (as clarified).

- 6) With respect to Section 5.4 of ANSI N45.23-1978 titled Record Retention: CP&L will substitute the following sentence for this Section.

Qualification records shall be retained as required by the CP&L Quality Assurance Program.