CP&L

Carolina Power & Light Company

HARRIS NUCLEAR PROJECT
P.O. Box 165
New Hill, NC 27562

OCT 0 8 1986

File Number: SHF/10-13510E
Letter Number: HO-860358 (O)

Dr. J. Nelson Grace
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30323

NRC-487

Dear Dr. Grace:

In reference to your letter of September 23, 1986, referring to RII: 50-400/86-60-01, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

It is considered that the corrective actions taken are satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Yours very truly,

R. A. Watson

R. A. Watson
Vice President
Harris Nuclear Project

MW/cge

Attachment

cc: Messrs. G. Maxwell (NRC-SHNPP)
B. C. Buckley (NRC)

MEM/HO-860358O/PAGE 1/OS1

IE01 1/1

Attachment to CP&L Letter of Response to NRC Report RII:
50-400/86-60-01

Reported Violation:

10CFR50.55(f)(1) requires CP&L to implement the Quality Assurance program described or referenced in the Preliminary Safety Analysis Report. Section 1.8.5.5 of the CP&L Quality Assurance Program requires that measures be established to ensure that drawings are in accordance with the documented plant configuration.

Contrary to the above, drawings were not in accordance with the documented plant configuration in that during the week of July 28, 1986, the resident inspectors found the as-constructed condition of the Emergency Service Water System, as described in Ebasco drawing CAR-2165-G-047, Rev. 17, CP&L Simplified Flow Diagram, CPL-2165-S-0547, Rev. 5, and FSAR drawing 9.2.1-1, did not show piping modifications and the actual piping arrangement of the installed equipment.

This is a Severity Level V violation (Supplement II).

Denial or Admission and Reason for the Violation:

The violation is correct as stated. Flow diagram drawings and physical arrangement drawings were worked by separate groups within the Design Sub-Unit. No cross-check between flow diagram drawing revisions and physical arrangement details were performed. The lack of this cross-check led to the referenced violation.

Corrective Steps Taken and Results Achieved:

Ebasco drawing 2165-G-047 and Simplified Flow Diagram 2165-S-0547 have been revised (Rev. 19 and Rev. 8 respectively) to correct the discrepancies noted by the inspector. FSAR figures will be updated periodically to reflect the latest revision of the flow diagram drawing. In addition, revisions to the safety related portions of other flow diagram drawings have been reviewed against the physical design details to ensure that they are consistent. No other inconsistencies were found.

Corrective Steps Taken to Avoid Further Noncompliance:

Instructions were issued to the Design Sub-Unit on August 9, 1986 requiring that flow diagram drawing revisions be reviewed against physical design details for consistency prior to submitting the revision to the Engineering Sub-Unit for review.

Date When Full Compliance Was Achieved:

Full compliance was achieved on August 22, 1986.