



Carolina Power & Light Company

RFB

December 10, 1975

Mr. N. C. Moseley, Director  
U. S. Nuclear Regulatory Commission  
230 Peachtree Street, N. W. - Suite 818  
Atlanta, Georgia 30303

Dear Mr. Moseley:

As the result of discussions with our architect-engineer and members of the NRC technical review staff, and a telephone conversation on December 5, 1975 between the RO:II Inspector for SHNPP and our Manager of Engineering Quality Assurance, we have concluded that our Company is applying a Valve Wall Thickness Verification Program that is in excess of requirements necessary to assure that procured valves meet code and are safe and reliable. CP&L's current Valve Wall Thickness Verification Program was discussed and agreed to with RO:II personnel on November 20, 1974, and was formally transmitted to RO:II on November 25, 1974. This Program was developed in response to the SHNPP PSAR commitment answering question 1.10 of Mr. R. C. DeYoung's letter of July 7, 1972 (PSAR paragraphs 1.8.3.2.3 and 1.8.3.3.3c), as well as RO:II letters RO:II:FJL50-400, 50-401, 50-402, 50-403 dated February 16, 1973 and RO:II:JGD50-400, 50-401, 50-402, 50-403 dated June 30, 1972 on this subject.

CP&L's program requires extensive procedures by valve vendors with special documentation and utility approval. The strong emphasis on valve wall thickness verification since 1972 has resulted in significant industry improvement, in which valve vendors in the normal course of manufacturing processes place the necessary emphasis on valve wall thickness verification. This eliminates the need for a special utility program such as ours. This is demonstrated by the fact that CP&L has reviewed the standard valve wall thickness verification procedures of four vendors (i.e., Velan, Crosby, Anchor/Darling, and Pacific) and approved them with no significant comment and our A-E and NSSS Supplier relate similar cases for other utilities. During the past three years, valve vendors have undergone many such reviews and approvals of their procedures by various customers and this has resulted in generic procedures and methods that are more than adequate and that have apparently been found adequate by the NRC. In view of this industry improvement; the additional coverage now being provided by the new NRC RO:IV vendor audit group; and the CP&L, NSSS Supplier, and A-E vendor surveillance efforts, CP&L now considers that the vendor's certification that ASME Code requirements have been met provides adequate assurance that their valves meet the required wall thickness requirements. Therefore, CP&L wishes to modify its response to the aforementioned question 1.10 of Mr. DeYoung's letter and the RO:II compliance letters. Our new position would delete the Valve Wall Thickness Verification Program transmitted to RO:II on November 25, 1974 and modify the present PSAR paragraphs to indicate that the vendor ASME Certification, along with vendor surveillance activities by CP&L, the NSSS Supplier, and A-E, provides adequate assurance that supplied valves meet the required valve wall thickness requirements.

Mr. N. C. Moseley

-2-

December 10, 1975

We desire NRC RO:II acceptance of our intended course of action before submitting a PSAR amendment. We are in the process of negotiating new contracts with various valve vendors and ask that you review this matter as soon as possible.

Yours very truly,

A handwritten signature in dark ink, appearing to read "W B Kincaid". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

W. B. Kincaid - Vice President  
Power Plant Engineering Department

LEJ/gw

cc: Mr. J. A. Jones  
Mr. E. E. Utley

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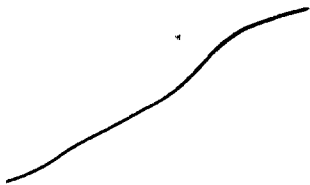
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W. B. Kincaid - Vice President  
Power Plant Engineering Department

LEJ/gw

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Mr. E. E. Utley

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