

REGION II
ATLANTA, GEORGIA

CP&L

Carolina Power & Light Company

82 AUG 11

A 7 . 42

P. O. Box 101, New Hill, N. C. 27562
August 5, 1982

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

NRC-3

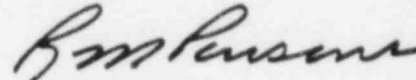
Dear Mr. O'Reilly:

In reference to your letter of July 7, 1982, referring to RII: GFM 50-400/401/82-21, the attached is Carolina Power & Light Company's reply to the violation identified in Appendix A.

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

Thank you for your consideration in this matter.

Yours very truly,



R. M. Parsons
Project General Manager
Shearon Harris Nuclear Power Plant

RMP/sh

Attachment

cc: Mr. J. A. Jones

8209160537 820903
PDR ADOCK 05000400
Q PDR

Reported Violation:

10 CFR 50, Appendix B, Criterion V as implemented by PSAR section 1.8.5.5, CP&L's Corporation QA Program section 6.2.5 and site construction procedures TP-28 and WP-105 require that the QA program be carried out in accordance with procedures or instructions.

Contrary to the above, on June 2, 1982 and on June 4, 1982, the CP&L procedures for the installation and inspection of class IE switchgear were not carried out, in that on June 2, 1982 switchgear 1A-SA cubicles were being anchor welded prior to first receiving the required equipment setting inspection, and on June 4, 1982 three of four cubicles checked were found not to be plumb or level as required by the manufacturer's requirements, even though the equipment traveler for 1A-SA has been signed by the responsible millwright personnel sometime between June 2 and June 4 showing acceptance for equipment setting.

Denial or Admission and Reasons for the Violation:

The violation is correct as stated; however, clarification of reported conditions is considered appropriate due to the wording of the report details. Paragraph 6.c of the report states "the above unsatisfactory conditions indicate failure to install and inspect class IE equipment in accordance with the requirements of established procedures and instructions." The point of clarification is that the inspection personnel had deliberately withheld (versus "failure") inspection completion and sign-off of the equipment traveler. This was due to unresolved questions pertaining to the equipment fabrication.

The reason for the premature welding of the equipment was an oversight by the welding personnel during review of equipment travelers to determine which piece of equipment was ready for welding.

The reason for the sign-off by the responsible millwright personnel, on or about June 2, 1982, was lack of full knowledge of the sign-off process as it related to this particular equipment item and the associated inspection status. The millwright superintendent was aware of previously completed inspection points that would have permitted sign-off for equipment set inspection, had it not been for the existence of the unresolved questions on the equipment fabrication. Inasmuch as the equipment was previously found to be plumb, and then out-of-plumb following millwright sign-off, it is theorized that, unbeknown to the superintendent, the interim removal and reinstallation of a bus bar access panel disturbed the plumbness of the equipment.

Corrective Steps Taken and Result Achieved

The anchor welds that were made prematurely were removed. The equipment has been placed in a plumb position, reinspected and found satisfactory, and the equipment set inspection hold-point on the traveler signed off by the inspection personnel on July 27, 1982.

Corrective Steps Taken to Avoid Further Noncompliance

On June 3, 1982, pertinent millwright and welding personnel were given instructions to reaffirm their responsibilities: in maintaining awareness of the status of construction and inspection activities; and in maintaining work and inspection sequence in accordance with process control documents.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 27, 1982.