



Carolina Power & Light Company REGION II  
ATLANTA, GEORGIA

May 19, 1982

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

Dear Mr. O'Reilly:

In reference to your letter of April 19, 1982, referring to RII:  
RWW 50-400/401/82-07, the attached is Carolina Power & Light Company's  
reply to the deficiencies identified in Appendix A.

It is considered that the corrective and preventive actions taken will  
be satisfactory for resolution of the item, once completed.

Thank you for your consideration in this matter.

Yours very truly,

H. R. Banks  
Manager  
Corporate Quality Assurance

NJC:jp

Attachment

cc: Mr. J. A. Jones

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#### Severity Level IV Violation

10 CFR 50, Appendix B, Criterion XVIII and the accepted QA program in the PSAR Section 1.8 require a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program. CP&L is committed to Regulatory Guide 1.144. Paragraph 3.a(2) of the subject guide requires the licensee to audit internal design and construction phase activities annually or at least once within the life of the activity, whichever is shorter.

Contrary to the above, examination of audits conducted by the Corporate Performance Evaluation Unit during calendar year 1981 revealed that no audits were performed for concrete or protective coating activities, reinforcing steel controls, or for mechanical equipment installation activities although such activities were in progress at that time.

#### Denial of Admission and Reason for Violation

- (1) Carolina Power & Light Company admits that the following activities were not audited in 1981: concrete, protective coating, reinforcing steel, and mechanical equipment installation. These activities were in progress during 1981. Although these activities were not audited by the audit group, the activities were covered by surveillance/monitoring by the site QA/QC Unit. These activities were not considered to be out of control at anytime.
- (2) In 1980, two Quality Assurance Audit Units were involved in the audit program at SHNPP. One of the units was responsible for ASME audits; the other unit was responsible for the other audits required by the Corporate QA Program. In 1981, the responsibility for planning and scheduling all of the SHNPP site audits was delegated to one person. During the transition period when two accountability systems were being consolidated into one system, Performance Evaluation failed to determine that audits of the activities identified above were required in 1981.

#### Corrective Steps Taken and Results Achieved

Audits performed in 1980 & 1981 are being reviewed to determine if other activities were not audited as required. If any others are found they will be included in the future audit schedule. Concrete, protective coating reinforcing steel, and mechanical equipment installation will be audited during the week of May 24-28, 1982.

#### Corrective Steps Taken to Avoid Further Noncompliance

Planning and scheduling SHNPP site audits has been delegated to the same Senior QA Specialist responsible for all of the audits; engineering, construction, and quality assurance; performed at the site. Failure to audit activities as required has been discussed with the Specialist now responsible for the site audit program. The necessity of giving sufficient attention to planning and scheduling of audits to insure that they are performed as required was emphasized to the Specialist.

#### Date When Full Compliance Will Be Achieved

Full compliance will be achieved by June 30, 1982.