



Carolina Power & Light Company

REGION II
ATLANTA, GEORGIA

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P. O. Box 101, New Hill, N. C. 27562
May 12, 1983

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 3100)
Atlanta, Georgia 30303

NRC-69

Dear Mr. O'Reilly:

In reference to your letter of April 12, 1983, referring to RII: CRM 50-400/83-07, the following is Carolina Power and Light Company's reply to the violation identified in Appendix A:

The violation is denied. ASME Section III, 1971 Edition, through Summer 1973 Addendum, requires no specific documentation for upgrading of components from one Code Class to another, other than records of the nondestructive examination (NDE) required for the higher classification and certification by the Fabricator of the ASME classification and that the requirements have been met. The ASME Code has no requirement or provision for voiding a Code stamp and restamping when reclassifying an item.

Records of the NDE required for ASME Section III, Class 1 items were located in the Supplier's data packages for piping subassemblies which included the two 90 degree elbows in question and 51 other fittings which had been reclassified to Class 1. The ASME NPP-1 Data Report forms, certifying the ASME Code classification (Class 1) of the subassemblies and the material data were properly filled out and certified by the Fabricator and the Authorized Nuclear Inspector.

Having determined that ASME Code requirements have been met and that the Supplier followed his Quality Assurance program procedure for reclassification of materials, we conclude that no violation of requirements exist.

In addition to the question on upgrading the elbows, we conducted investigations into the possible use of sharp nosed stencils (impression stamps) to mark the same elbows and the fact that raised areas along the arc of some of the fittings caused them to appear to be welded rather than forged.

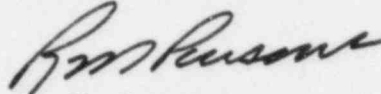
The Fabricator, in response to our questions, has assured us, in writing, of their total compliance to the requirements for use of low stress stamps. A study by CP&L engineers, which included sectioning examples of stamped items, indicated that impressions which appeared to be sharp, did in fact, meet the low stress criteria.

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CP&L Metallurgical Engineers visually examined the fittings and determined that they were forged and not welded. The material test reports provided by the Supplier certify that the fittings are forged.

Thank you for your consideration in this matter.

Yours very truly,



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

RMP/sh

cc: Mr. P. Kadambi (NRC)
Mr. R. Prevatte (NRC-SHNPP)
Mr. G. F. Maxwell (NRC-SHNPP)