



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
July 29, 1983

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USNRC REGION 1
ATLANTA, GEORGIA

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30303

NRC-101

Dear Mr. O'Reilly:

In reference to your letter of June 30, 1983, referring to RII: JWY 50-400/83-20, the attached is Carolina Power and Light Company's reply to the violation identified in Appendix A.

It is considered that the corrective action taken is 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: Messrs. G. Maxwell/R. Prevatte (NRC-SHNPP)
Mr. P. Kadambi (NRC)

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Reported Violation:

10 CFR 50, Appendix B, Criterion V, as implemented by PSAR paragraph 1.8.5.5 requires that activities affecting quality be prescribed by documented instructions, procedures, and drawings and be accomplished in accordance with these instructions, procedures and drawings. Shearon Harris WP-110, Rev. 8 states the procedure and acceptance criteria for inspection of seismic pipe hangers.

Contrary to the above, between June 6-10, 1983, activities affecting quality were not being accomplished in accordance with documented procedures and drawings in that a reinspection of ten hangers revealed three hangers with deviations from documented requirements.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated, though clarification of the details of the report is considered to be appropriate.

Hanger CS-H-2457 was inspected to Phase I by the CI inspector (hanger QC inspector), who found that a 4" x 4" x 5/8" plate had been installed in lieu of the specified 4" x 4" x 1/2" plate. This condition was reported as unsatisfactory, which resulted in the generation of a new pipe hanger site sketch revision. The inspector (no longer employed) apparently assumed that the actual condition would be included in the revised sketch and be acceptable as-is. Upon issue of the revised sketch, the inspector failed to detect that the new specified dimensions had been changed to 5" x 5" x 5/8" in lieu of 4" x 4" x 5/8". The records suggest that the inspector made a document review error as opposed to a physical inspection error.

The condition reported for hanger RH-H-165 (Phase I inspected March 1981) was not detectable as part of the established inspection requirements at the time the CI inspector performed his inspection. The dimension that made this item unacceptable was not available at the time of the inspection. As a result, the inspector performed the inspection in accordance with the existing procedure and other governing documents at the time.

For hanger SI-H-29, the CI inspector misread and/or improperly positioned the measuring device during the inspection.

Corrective Steps Taken and Results Achieved:

Hanger CS-H-2457 has been evaluated and the 4" x 4" x 5/8" plate was determined to be acceptable as-is. The pipe hanger sketch has been revised accordingly.

Hanger RH-H-165 is being reworked to remove the improper welded beam attachment.

Hanger SI-H-29 has been evaluated and the 3/8" tube steel thickness was determined to be acceptable as-is. The pipe hanger sketch has been revised accordingly.

Corrective Steps Taken to Avoid Further Noncompliance:

1. For hanger CS-H-2457, the CI inspector ceased employment on this project prior to this problem being identified.

For hanger RH-H-165 and other similar hangers, the dimensions not previously available were made available to the CI inspectors in February 1982. This is an example of one reason why Phase II is a total reinspection of Phase I items with the exception of weld fitup gaps.

For hanger SI-H-29, the inspector error has been reviewed with the CI inspector of record. The review included involving the inspector in re-measurement of the tube steel piece in nonconformance. This is considered to be an isolated condition.

2. A sample of 12 Phase II hangers was checked for selected items by our QA surveillance group. This surveillance did not reveal any CI inspector-related problems similar to the hangers in question. Some problems were found and are being handled on nonconformance reports although the problems found do not directly relate to the subject in question.
3. Site policy has been reemphasized to make sure that the CI inspectors understand that no credit is to be given to the Phase I inspection when the Phase II inspection is being performed. Also, the site procedures are being modified to declare that CI Phase I inspections are a non-credit, preliminary inspection because of: 1) the "lessons learned" during the past several years of hanger erection and inspection, 2) the possibility that the hanger has been adjusted or modified after the Phase I CI inspection since the hanger is only tacked, and 3) the possibility of human error. The site procedures are also being modified to more clearly define what inspections are considered final at Phase II.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved on August 15, 1983.