

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 84 JAN 19 P12:43

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY) Docket No. 50-261-OLA
)
(H.B. Robinson Steam Electric Plant,) ASLBP No. 83-484-03LA
Unit 2))

SUPPLEMENT TO APPLICANT'S ANSWERS TO THE
HARTSVILLE GROUP FIRST SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE

Since the service of CP&L's Answers to the Hartsville Group's First Set of Interrogatories on June 30, 1983, there have been additional responses by CP&L to violations assessed by the NRC at Severity Level III (Interrogatory No. 1-30) and Severity Level IV (Interrogatory No. 1-31). CP&L hereinbelow supplements its answer to said Interrogatory No. 1-30 and Interrogatory No. 1-31 as follows:

* * * *

INTERROGATORY NO. 1-30. Describe in detail each C P & L violation of NRC operating procedures, rules and regulations categorized at Severity Level III pursuant to NRC Enforcement Policy.

SUPPLEMENT TO ANSWER 1-30. For the Brunswick Plant, see BSEP Attachment 1.b.SUPPLEMENT attached hereto.

INTERROGATORY NO. 1-31. Describe in detail each C P & L violation of NRC operating procedures, rules and regulations categorized at Severity Level IV pursuant to NRC Enforcement Policy.

SUPPLEMENT TO ANSWER 1-31. For the H. B. Robinson Plant, see HBR Attachment 2.a.SUPPLEMENT attached hereto. For the Brunswick Plant, see BSEP Attachment 2.b.SUPPLEMENT attached hereto. For the Harris Plant, see SHNPP Attachment 2.c.SUPPLEMENT attached hereto.

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ESEP

ATTACHMENT 1.b.

SUPPLEMENT

CP&L

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

Severity Level III

SEP 27 1983

SERIAL: LAP-83-421

E. E. UTLEY
Executive Vice President
Power Supply and Engineering & Construction

ATTACHMENT
CONTAINS INFORMATION
WHICH IS:

SAFEGUARDS INFORMATION

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Region II
P.O. Box 2203
Atlanta, GA 30301

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
I.E. INSPECTION REPORTS 50-324/83-24 AND 50-325/83-24
RESPONSE TO NOTICE OF VIOLATION

Dear Mr. O'Reilly:

In accordance with the Code of Federal Regulations, Title 10, Section 2.201, Carolina Power & Light Company (CP&L) provides the enclosed response to the September 1, 1983 transmittal of IE Inspection Reports 50-324/83-24 and 50-325/83-24 for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. The response to the violation identified is enclosed as Attachment A.

Since the content of Attachment A deals with matters pertaining to plant security, CP&L requests that this information be protected as Safeguards Information in accordance with the provisions of 10 CFR 73.21, and if redesignated as not protected, we request that this information be withheld from public disclosure as provided in 10 CFR 2.790(d)(1).

UNAUTHORIZED DISCLOSURE SUBJECT
TO CRIMINAL & CIVIL SANCTIONS
-10 CFR 73.80-

WHEN SEPARATED FROM ENCLOSURES,
HANDLE THIS DOCUMENT AS DECONTROLLED.

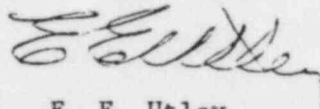
SEP 27 1903

James P. O'Reilly

-2-

If you have any questions concerning this response, please contact our staff.

Yours very truly,

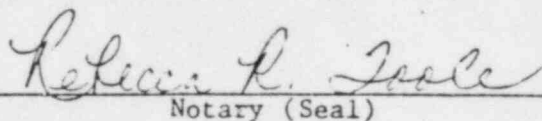


E. E. Utley

WRM/pgp (7874WRM)
Enclosure

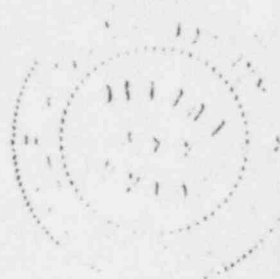
cc: Mr. D. O. Myers (NRC-BSEP)
Mr. S. D. MacKay (NRC)

E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.



Notary (Seal)

My commission expires: My Commission Expires 6-8-86



HBR

ATTACHMENT 2.a.

SUPPLEMENT



Carolina Power & Light Company

Company Correspondence

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

AUG 12 1983

Robinson File No: 13510E

Serial: RSEP/83-1032

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT IER-83-15

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

A. SEVERITY LEVEL 4 VIOLATION (IER-83-15-01-SL4)

10CFR50, Appendix B, Criterion 16, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. This requirement is implemented by Corporate Quality Assurance Program Section 15 and Plant Administrative Instruction 12 and 15 concerning nonconformance/deviation corrective action tracking. CP&L letter RSEP/83-83, dated January 21, 1983, and IE Inspection Report 261-82-37 document necessary corrective action for the deviation associated with the failure to install a low pressure alarm on the backup nitrogen system for the low temperature overpressure protection system.

Contrary to the above, as of May 22, 1983, adequate corrective actions were not taken in that backup nitrogen pressure for the low temperature overpressure protection system was not being checked at least daily to ensure adequate nitrogen supply. This resulted in the nitrogen pressure being below the minimum required by Plant Operating Procedure-50 during a period when the low temperature overpressure protection system was required to be operable.

Response:

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Alleged Violation

The low temperature overpressure protection system (LTOP) operates on 85 psig instrument air. Bottled nitrogen is used as a backup pressure supply.

Discussion in NRC Inspection Report IER-82-37 identified an Inspector Followup Item (IER-82-37-07-IFI) to ensure a low pressure nitrogen alarm is installed during the next refueling outage. Included in this paragraph, the Inspector discussed CP&L's intention to check the bottle nitrogen pressure daily when the LTOP system is required operable. Although both items were identified by the Plant as requiring commitment tracking, only the commitment to install the low pressure nitrogen alarm was tracked under IER-82-37-07-IFI.

If the intention to check the pressure daily had entered the tracking system, then it would have been proceduralized.

Remembering the earlier discussion with the NRC Inspector, the Operators were directed to check the LTOP bottled nitrogen pressure daily during the May Steam Generator Outage shutdown. However, the bottled nitrogen pressure was not checked for a day and a half during the subsequent startup. When checked, the bottled nitrogen backup pressure was at 400 psig which is below the required 800 psig. This pressure would have allowed the Power Operated Relief Valves (PORV) to operate through 73 cycles.

3. Corrective Steps Which Have Been Taken and Results Achieved

Considering the volume of the 400 psig bottled nitrogen backup pressure, our Engineering Evaluation determined that the PORVs would cycle 73 times if the normal supply of instrument air is lost.

Checking the LTOP bottle nitrogen pressure at least daily, when the system is required operable, has been proceduralized in the Minimum Equipment List (Standing Order 11).

In addition, Operations has implemented a new book of information and directives which is provided by the Operating Supervisor to the Shift Foremen and STAs. Regulatory and other key operational issues are to be documented by the Operating Supervisor and reviewed by the Shift Foremen and STAs. This document will provide more timely and consistent information of significant issues to the Shift Foremen.

Commencing in 1983, the QA personnel review NRC Inspection Reports and responses to ensure that all identified commitments have been included in the commitment tracking system.

This event has been reviewed by personnel involved in maintaining the Plant commitment tracking system.

4. Corrective Steps Which Will Be Taken to Prevent Further Violations

Corrective steps taken should prevent further violation.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

B. SEVERITY LEVEL 4 VIOLATION (IER-83-15-03-SL4)

Technical Specification 6.5.1.1.1 requires that written procedures shall be established and implemented that meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures controlling containment integrity.

Contrary to the above, as of June 6, 1983, adequate procedures had not been established or implemented in that the six capped instrument tubing lines in Sleeve 18 and the cap inside containment on penetration 67, sleeve 25, were not required to be checked during containment integrity verification.

Response:

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Alleged Violation

Although there is evidence that the caps on the Reactor Vessel Level Instrument System (RVLIS) penetration inside containment were installed, there is no evidence how or when they were removed. Modification 526 has evidence that the caps in question were installed per Modification 445-0. Modification 445-0 has a signoff on 3/2/81 that the RVLIS penetration plugs were installed. A review of outage construction and operation and maintenance activities in the vicinity of these RVLIS plugs did not reveal any evidence of the caps being removed.

3. Corrective Steps Which Have Been Taken and Results Achieved

Caps were installed on the RVLIS penetrations inside containment. The caps on the RVLIS penetration outside containment were hand checked for tightness to ensure the containment integrity had been maintained while the inner caps were removed.

4. Corrective Steps Which Will Be Taken to Prevent Further Violations

The RVLIS penetration caps will be included on the containment integrity check list. To provide a definite method of checking that the caps have not loosened, it has been proposed (subject to field verification) that shrink tubing be installed over the caps and part of the tubing. The integrity check would be to ensure the shrink tubing has not been tampered with. This method or an equivalent positive method will be installed during the next cold shutdown.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved prior to the startup following the cold shutdown.

C. SEVERITY LEVEL 5 VIOLATION (IER-83-15-03-SL5)

Technical Specification 6.13.1.b requires that each high radiation area has a locked door and that the keys are maintained under administrative control of the Shift Foreman.

Contrary to the above, on June 1, 1983, the access door to the ion exchange/demineralizer room (a high radiation area) was found not to be locked and unaided. Unassisted entry to the room could be made without use of the Shift Foreman's keys.

Response:

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Alleged Violation

The Spent Resin Storage Tank Room had been previously locked. However, this lock did not adequately provide for rapid egress. During installation of a rapid egress lock, it was determined that the existing door was not compatible with the proposed lock. It was also determined that continued work on the lock would not be in accordance with good ALARA practices due to the high radiation levels around the full spent resin tank. Therefore, it was decided to finish work on the lock after the tank was emptied and as a temporary measure, a U-bolt lock was installed to accommodate egress. It is understood that the violation is based on the U-bolt lock being hand tight and not requiring a tool to loosen the bolts.

3. Corrective Steps Which Have Been Taken and Results Achieved

The area is now locked in such a manner so that a tool would be required in order to gain entry into this area.

4. Corrective Steps Which Will Be Taken to Prevent Further Violations

As soon as it became apparent that the H. B. Robinson staff's interpretation of what is required to secure a Locked High Radiation Area was not in complete agreement with the NRC's, additional guidance was sought from NRC. Based on the guidance received, all the Locked High Radiation Area doors were checked and after a few minor adjustments were verified to be secured by a lock or by a device that requires a tool to unsecure the access door.

The Locked High Radiation Area walls were also checked for ladders which could be used to easily go in access over the walls. This check did not indicate any problem areas.

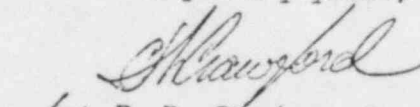
A new barrier with a rapid egress door will be installed in the Spent Resin Storage Tank Room when the tank is emptied.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by October 1, 1983.

If you have any questions concerning this response, please contact my staff or me.

Very truly yours,



for R. B. Starkey, Jr.
General Manager
H. B. Robinson SEG Plant

CLW:FMG:JMC:CWC/bss

cc R. C. DeYoung

CP&L

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

SEP 30 1983

Robinson File No: 13510E

Serial: RSEP/83-1237

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W., Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23

SUPPLEMENTAL RESPONSE - I.E. INSPECTION REPORT NO. 83-15

Dear Mr. O'Reilly:

Based on the phone conversation of August 24, 1983, between the NRC Senior Resident Inspector and the H. B. Robinson Manager of Technical Support, Carolina Power and Light Company (CP&L) provides the following information as a supplement to CP&L's August 12, 1983 response to Violation B of the subject Inspection Report.

B. SEVERITY LEVEL 4 VIOLATION (IER-83-15-03-SL4)

Technical Specification 6.5.1.1.1 requires that written procedures shall be established and implemented that meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures controlling containment integrity.

Contrary to the above, as of June 6, 1983, adequate procedures had not been established or implemented in that the six capped instrument tubing lines in Sleeve 18 and the cap inside containment on Penetration 67, Sleeve 25, were not required to be checked during containment integrity verification.

RESPONSE:

The six (6) capped instrument tubes and their respective caps in Sleeve 18 were fitted with shrink tubing so the operators could determine during their containment integrity checks that the caps have not been tampered with. While the unit was on the line, shrink tubing was installed in the

tubing/caps outside containment in August, 1983, and on the tubing/caps inside containment during a cold shutdown in September, 1983.

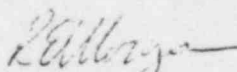
The caps on both ends of Sleeve 18 and the cap inside containment on Penetration 67, Sleeve 25, have been added to the containment integrity checklist, Operating Procedure OP-1954.

A preliminary review of mechanical penetrations has not identified any additional penetrations that need to be added to the containment integrity checklist. A complete review of all penetrations will be conducted during the next refueling outage.

The modification control procedures were revised in 1983 to address the conduct of partial turnovers of in-progress modifications prior to heating up the Plant above cold shutdown. This partial turnover process should ensure controls are established on capped lines penetrating containment resulting from modifications.

If you have any questions concerning this supplemental response to the subject Inspection Report, please contact me or my staff.

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson SEG Plant

CLW/bss

cc: R. C. DeYoung (1)

CP&L

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

COPY

SERIAL: LAP-83-545

DEC 12 1983

E. E. UTLEY
Executive Vice President
Power Supply and Engineering & Construction

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
I. E. INSPECTION REPORT NO. 50-261/83-22
RESPONSE TO NOTICE OF VIOLATION

Dear Mr. DeYoung:

In accordance with the Code of Federal Regulations, Title 10, Section 2.201, Carolina Power & Light Company (CP&L) provides the enclosed response to the November 15, 1983 transmittal of IE Inspection Report 50-261/83-22 for the H. B. Robinson Steam Electric Plant, Unit No. 2. The response to the violation identified is enclosed as Attachment A.

Since the contents of Attachment A deal with matters pertaining to plant security, CP&L requests that this information be protected as Safeguards Information in accordance with the provisions of 10 CFR 73.21, and if redesignated as not protected, we request that this information be withheld from public disclosure as provided in 10 CFR 2.790(d)(1).

In as much as CP&L does not protest the imposition of the civil penalty, please find enclosed a check in the amount of Twenty Thousand Dollars (\$20,000) in payment of this penalty.

**WHEN SEPARATED FROM ENCLOSURES,
HANDLE THIS DOCUMENT AS DECONTROLLED.**

DEC 12 1983

Richard C. DeYoung

- 2 -

If you have any questions concerning this response, please contact our staff.

Yours very truly,

Original Signed By

E. E. UTLEY

E. E. Utley

JBW/tda (85510NH)
Attachments

cc: Mr. J. P. O'Reilly (NRC-RII) W/A*
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)

E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Margaret L. Sparks
Notary (Seal)

My commission expires: June 5, 1984

bcc: Mr. G. P. Beatty, Jr.
Mr. D. L. Bensinger
Mr. G. S. Cashell
Mr. R. M. Coats
Mr. A. B. Cutter
Dr. T. S. Elleman
Ms. S. F. Flynn
Mr. B. J. Furr
Mr. F. M. Gilman (HBR)
Mr. J. L. Harness
Mr. P. C. Hopkins
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. A. H. McDaniel

Mr. L. H. Martin
Mr. R. L. Mayton, Jr.
Mr. S. McManus
Mr. R. E. Morgan (HBR) W/A
Mr. C. H. Moseley, Jr.
Mr. D. L. Nordstrom (LIS)
Mr. D. C. Stadler
Mr. J. J. Sheppard
Mr. A. C. Tollison
Mr. J. B. Walker, Jr. W/A
Mr. A. R. Wallace
Mr. J. L. Willis
Mr. H. J. Young
File: RC/A-2
File: R-2-0700
File: 13510.2

*Only those individuals with W/A (with Attachment) following their names are to receive copies of the letter and Attachment. All other individuals and files to receive the letter only.

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

DEC 1 1983

Robinson File No: 13510E

Serial: RSEP/83-1410

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
Response to NRC Inspection Report IE-83-26

Dear Mr. O'Reilly:

Carolina Power and Light Company has received and reviewed the subject report and provides the following response.

A. Severity Level IV Violation (IER-83-26-04-SL4)

Technical Specification 6.5.1.1.1.a requires that written procedures be implemented that meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2. Regulatory Guide 1.33 requires procedures for access control to radiation areas including a radiation work permit system. Licensee Health Physics Procedure-006, Revision 0 establishes these procedures and radiation work permit (RWP) requirements.

Contrary to the above, as of September 10, 1983, this procedure had not been implemented in that 1) a mechanic performed work on RWP 1470 Revision 1 in a high radiation and high contamination area without required health physics coverage or respiratory protection and 2) a health physics technician responsible for work on RWP 1470 Revision 1 did not provide the required continuous coverage. This resulted in ingestion of radioactive material by the mechanic to levels approaching 16 MPC-hours.

Response

1. Admission or Denial of Alleged Violation

Carolina Power and Light acknowledges the alleged violation.

2. Reason for Admission

The individual was involved in the removal of the pressurizer spray valve, RC-455B, to the operating deck of containment. During the morning of the incident, health physics (HP) personnel determined the need for additional dosimetry and respiratory protection. In response the radiation work permit for the work (RWP 1470 Revision 0) was revised (Revision 1) to require additional dosimetry, continuous health physics coverage, and respiratory protection for cleaning of the valve. This RWP was made available prior to the individual re-entering his work area in containment that afternoon. The individual later indicated he had not read Revision 1 to the RWP before signing the RWP Log and entering containment. The individual mistakenly thought that it was the HP technician's responsibility to inform him of any changes in the RWP.

Additionally, contrary to the RWP, there was no continuous HP coverage during the cleaning and filing operation. The HP technician was not aware that the operation was in progress until he found the individual cleaning and filing on the valve. The HP technician had previously provided coverage while the individual inspected the valve, but later left the area without halting work or emphasizing work must not continue in his absence. Upon discovery of the cleaning operation, the HP technician immediately halted all work. Upon exiting the containment it was determined that the individual was internally contaminated.

3. Corrective Action Taken and Results Achieved

The individual was excluded from the Radiation Control Area until resolution of the contamination incident. A bioassay program was initiated to determine the extent of internal contamination. The bioassay and whole body count program concluded the individuals intake equaled to approximately 16 MPC hours.

4. Corrective Action That Will be Taken to Prevent Further Violation

The individual has been formally reprimanded. Additional training of HP and maintenance personnel on the purpose of RWPs and of compliance to them will be conducted prior to the next refueling outage. Lessons learned will be added to the general employee radiation control training.

6. Date When Full Compliance Will be Achieved

Corrective actions will be completed by February 29, 1984.

B. Severity Level IV Violation (IER-83-26-01-SL4)

Technical Specification 4.2.5.2 requires that all steam generator tubes that are determined to have degradation exceeding the plugging limit, as defined in Technical Specification 4.2.5.1.5, shall be plugged prior to return to power.

Contrary to the above, as of September 5, 1983, two tubes in 'A' Steam Generator had not been plugged despite May 1983 eddy current data indicating that both tubes exhibited essentially through-wall indications. This resulted in a required plant shutdown due to primary-to-secondary leakage.

Response

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

On September 5, 1983, with the unit at 79% power, a primary-to-secondary leak, which had been monitored since June, 1983 in "A" Steam Generator increased to approximately .32 GPM. The Plant was shutdown for inspection and repair of "A" Steam Generator.

Upon inspection of "A" Steam Generator, two tubes, Row 14, Column 19, (Hot Leg) and Row 28, Column 57 (Cold Leg) were determined to be leaking. Eddy Current examination of these tubes revealed approximately 100% indications at 18 inches and 23 inches above the tubesheet respectively. A review of the Eddy Current Testing (ECT) tapes from the May, 1983 Steam Generator Inspection determined that both tubes exhibited near through-wall indications and should have been plugged. Based on this information, it was concluded that these two tubes proceeded to through-wall as would be predicted by previous corrosion rate calculations.

3. Corrective Steps Taken and Results Achieved

The two leaking tubes were mechanically plugged and hydrotested satisfactorily on September 11, 1983.

Additionally, on September 11, 1983, a re-examination of 10% of the ECT tapes from the May, 1983 inspection of "A" Steam Generator was completed and no additional missed pluggable indications were discovered.

In October, 1983, a review of all the ECT tapes from the May, 1983 Outage was begun. On November 2, 1983, during the course of this complete re-review a tube was identified with a potential 92% defect. Continued operations based on this indication could not be justified, therefore, a plant shutdown was begun for corrective action. It was decided that a full scope eddy current inspection would be performed to determine the condition of the Steam Generators.

The investigation as to the root cause of why the two tubes were missed has not been completed. Some steps were taken during the November Steam Generator inspection to reduce the likelihood for missing tubes. The effectiveness of these steps is continuing to be reviewed. Upon completion of our investigation a supplemental response to this violation

will be provided with the corrective actions to prevent further violations.

5. Date When Full Compliance Will be Achieved

A supplemental response will be provided by January 31, 1984.

C. Severity Level V Violation (IER-83-26-05-SL5)

Technical Specification 6.5.1.1.1.a requires that written procedures be established that meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2. Regulatory guide 1.33 requires procedures for operation and calibration of nuclear instruments and the reactor protection system.

Contrary to the above, as of September 15, 1983, procedures had not been established to control the data acquisition and evaluation and require the formal review and approval of subsequently developed setpoints for calibration of the intermediate range nuclear instrument reactor trip setpoints and rod stop setpoints.

Response

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

During a June 23, 1983 shutdown, an intermediate range high flux trip signal initiated at 16% instead of 25% (Plant did not trip because trip was defeated). On July 29, 1983, Nuclear Instrumentation data was taken to reset these intermediate range trip setpoints. The intermediate range trip setpoints were not reset prior to the September 5, 1983 shutdown. During a plant shutdown on September 5, 1983, to inspect steam generator tubes the plant tripped because an intermediate range high flux trip setpoint and reset were too low. The data gathered by the operators and the review of the data by the operations staff were thought appropriate. Although this process was not formalized into procedures, as stated in the violation, the information has since been verified to have been correct. It was determined that these intermediate range trip setpoint and reset problems are related to unique flux changes associated with the present core design.

3. Corrective Steps Taken and Results Achieved

The present intermediate range trip setpoints have been verified.

4. Corrective Steps Which Will be Taken to Avoid Further Violation

Procedure for the evaluation and determination of current corresponding to the nuclear instrumentation setpoints will be formalized for the next

to James P. O'Reilly
#: RSEP/83-1410
5 of 5

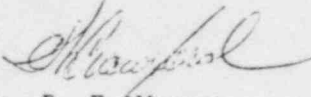
core cycle. In the interim the intermediate range detector responses will be monitored and any changes to setpoints will be proceduralized.

5. Date When Full Compliance Will Be Achieved

Procedures will be implemented prior to the start up for the next cycle.

If you have any questions concerning this response, please contact my staff or me.

Very truly yours,


for R. E. Morgan
General Manager
H. B. Robinson SEG Plant

CLW:FMG:JMC/th

cc: R. C. DeYoung
S. Weise



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303
December 21, 1983

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: REPORT NO. 50-261/83-27

This refers to the routine, safety inspection conducted by Mr. R. H. Albright of this office on October 3-7, 1983, of activities authorized by NRC Operating License No. DPR-23 for the H. B. Robinson facility. Our preliminary findings were discussed with Mr. R. E. Morgan, Plant General Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. Elements to be included in your response are delineated in Appendix A. One new unresolved item is identified in the enclosed inspection report. This item will be examined during subsequent inspections.

We have examined actions you have taken with regard to previously identified enforcement matters. These are discussed in the enclosed inspection report.

One new unresolved item is identified in the enclosed inspection report. This item will be examined during subsequent inspections.

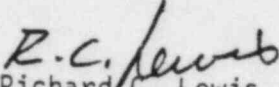
In accordance with 10 CFR 2.790(a), a copy of this letter, its enclosures, and your reply will be placed in NRC's Public Document Room upon completion of our evaluation of the reply. If you wish to withhold information contained in the inspection report, please notify this office by telephone and include a written application, to withhold information contained therein, in your response. Such application must be consistent with the requirements of 2.790(b)(1).

December 21, 1983

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,


Richard C. Lewis, Director
Division of Project and
Resident Programs

Enclosures:

1. Appendix A, Notice of Violation
2. Inspection Report No. 50-261/83-27

cc w/encls:

R. E. Morgan, Plant General Manager
G. T. Beatty, Jr., Manager
Robinson Nuclear Project Department

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson, Unit 2

Docket No. 50-261
License No. DPR-23

As a result of the inspection conducted on October 3-7, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9387 (March 9, 1982), the following violation was identified.

Technical Specification Table 4.1-3 item no. 14 states that once per operating cycle the charcoal and absolute filters for the Residual Heat Removal Compartments, HVE-5, shall be tested in-place to show ≥ 99 percent removal of polydispersed DOP particles by the HEPA filters and freon by the charcoal filters.

Technical Specifications 4.12 and 4.15 require the Control Room and Spent Fuel Building filter systems to be tested in-place at the stated frequencies. The in-place tests shall verify:

- 1) That the HEPA filters remove ≥ 99 percent of DOP when tested in-place in accordance with ANSI N101.1 (1972)
- 2) That the charcoal filters remove ≥ 99 percent of a halogenated hydrocarbon when tested in-place

ANSI N101.1 (1972) Section 3.3 requires that when a single sample point is used in determining filter efficiency, the sample point shall be representative of the DOP concentration across the sample plane. The single sample point for the unfiltered mixture may be considered representative of the sampling plane if the unfiltered mixture across the sampling plane is sufficiently uniform such that the maximum and minimum DOP concentrations do not differ by more than 10 percent of the maximum DOP concentration. The sampling plane for the filtered mixture shall be considered sufficiently uniform if the difference between the maximum and minimum DOP concentration is not more than 0.01 percent of the DOP concentration in the unfiltered air.

Contrary to the above, the tests demonstrating system operability performed prior to October 8, 1983, of the Spent Fuel Handling Building, Control Room, and Residual Heat Removal Compartment filter systems were inadequate in that:

- a. The single sample points used during the period of this inspection to determine filter efficiencies for the above systems were not representative in that DOP concentrations across the sample planes differed from the maximum DOP concentrations by 25 percent.

- b. The requirement that filters in the Residual Heat Removal Compartment and Control Room filter systems be tested in-place to verify ≥ 99 percent removal of DOP and halogenated hydrocarbon gas was not met in that in-place filter tests performed during the period of this inspection failed to include filter bypass in the efficiency test.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: December 21, 1983



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

DEC 29 1983

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: REPORT NO. 50-261/83-33

On November 11 - December 10, 1983, NRC inspected activities authorized by NRC Operating License No. DPR-23 for your Robinson facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed inspection report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The inspection findings indicate that certain activities violated NRC requirements. The violations, references to pertinent requirements, and elements to be included in your response are presented in the enclosed Notice of Violation.

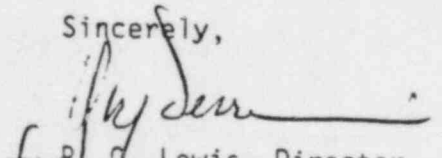
Your attention is invited to unresolved items identified in the inspection report. These matters will be pursued during future inspections.

In accordance with 10 CFR 2.790(a), a copy of this letter, its enclosures, and your reply will be placed in NRC's Public Document Room upon completion of our evaluation of the reply. If you wish to withhold information contained therein, please notify this office by telephone or include a written application to withhold information in your response. Such application must be consistent with the requirements of 2.790(b)(1).

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,


R. G. Lewis, Director
Division of Project and
Resident Programs

Enclosures: (See Page 2)

DEC 29 1983

Enclosures:

1. Notice of Violation
2. Inspection Report No. 50-261/83-33

cc w/encls:

R. E. Morgan, Plant General Manager
G. P. Beatty, Jr., Manager
Robinson Nuclear Project Department

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson 2

Docket No. 50-261
License No. DPR-23

The following violations were identified during an inspection conducted on November 11 - December 10, 1983. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

- A. 10 CFR 50, Appendix B, Criterion II, as implemented by the licensee's Corporate Quality Assurance Program, requires that activities affecting quality shall be accomplished under suitably controlled conditions.

Contrary to the above, as of November 5, 1983, the licensee failed to establish suitable controls on activities affecting safety-related service water equipment in that, underground power, control, and indication electrical cables for service water pumps and valves were damaged during power excavation activities.

This is a Severity Level IV (Supplement I).

- B. Technical Specification 6.5.1.1.1.a. requires that written procedures be implemented which meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures for equipment control. Administrative Procedure-027, Section 11.6, established the management controls for implementation of these requirements.

Contrary to the above, as of November 21, 1983, these procedures were not adequately implemented with respect to clearance 83-1613 in that fuses removed to disable the three main steam isolation valve control circuits were not identified by circuit affected and the appropriate clearance tags were not placed on those circuits.

This is a Severity Level V (Supplement I).

- C. Technical Specification 6.9.2.b(2) requires that conditions leading to operation in a degraded mode permitted by a limiting condition for operation be reported within thirty days by written report to the Regional Administrator of Region II.

Contrary to the above, as of December 5, 1983, the inoperability of one train of the low temperature overpressure protection system on November 4, 1983, had not been reported or identified as a reportable occurrence.

This is a Severity Level V (Supplement I).

Carolina Power and Light Company
H. B. Robinson 2

2

Docket No. 50-261
License No. DPR-23

Pursuant to 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

DEC 29 1983

Date: _____

8

BSEP

ATTACHMENT 2.b.

SUPPLEMENT



Carolina Power & Light Company

August 12, 1983

FILE: 13510.1

SERIAL: NO-83-816

Mr. R. C. Lewis, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region II
P. O. Box 2203
Atlanta, Georgia 30301

WHEN SEPARATED FROM ENCLOSURE,
HANDLE THIS DOCUMENT AS RADIOACTIVE

CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 & 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO NOTICE OF VIOLATION

Dear Mr. Lewis:

In accordance with the Code of Federal Regulations, Title 10, Section 2.201, Carolina Power & Light Company (CP&L) provides the enclosed response to the July 15, 1983, transmittal of IE Inspection Reports 50-324/83-22 and 50-325/83-22. The response to the violation identified is enclosed as Attachment A.

Inasmuch as the content of Attachment A deals with matters pertaining to plant security, it is requested that this information be protected as Safeguards Information in accordance with the provisions of 10CFR73.21, and if redesignated as not protected,

August 12, 1983

it is requested that this information be withheld from public disclosure as provided in 10CFR2.790(d) (1).

Yours very truly,

P. W. Howe

P. W. Howe
Vice President
Brunswick Nuclear Project

BB:nbs*
MEMO3

Attachment

Mr. P. W. Howe, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

Kay S. Hewett
Notary (Seal)

My commission expires: My Commission Expires 6-15-86

bcc: BC/A-4 (w/o Attachment)
B-X-0544 (w/o Attachment)
Mr. C. R. Dietz
Mr. K. E. Enzor (w/o Attachment)
Mr. P. W. Howe (w/o Attachment)
Mr. J. J. Sheppard (w/o Attachment)
Mr. J. B. Walker, Jr.

WHEN SEPARATED FROM ENCLOSED
HANDLE WITH CARE

CP&L

Carolina Power & Light Company

COPY

Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429

September 23, 1983

FILE: B09-13510C
SERIAL: BSEP/83-3167

Mr. James P. O'Reilly, Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street N.W.
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2
DOCKET NO. 50-325 AND 50-324
LICENSE NO. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 324/83-23 and 325/83-23 and finds that it does not contain any information of proprietary nature.

The report identified one item that appears to be in noncompliance with NRC requirements. This item and Carolina Power & Light Company's (CP&L) response are provided in the following text:

Violation

10CFR71.12 states conditions under which a general license for shipment in DOT specification containers is issued. One condition requires the person who uses a package pursuant to a general license to comply with the terms and conditions of the NRC Certificate of Compliance as it relates to the shipment package. The NRC Certificate of Compliance No. 5805, Revision No. 10 for CNS-3-55 shipping cask requires that, prior to delivery of the package to a carrier for transport, the package containment cavity shall be leak tested.

Contrary to the above, on March 31, 1983, the licensee made a large quantity shipment (shipment No. 83-166) in a CNS-3-55 shipping cask that had not been leak tested prior to delivery of the package to a carrier for transport.

This is a Severity Level IV violation (Supplement V).

CP&L Response

A. Admission or Denial of the Violation

CP&L acknowledges that a violation of NRC requirements did occur.

B. Reason for the Violation

This violation resulted from the failure by CP&L to identify the additional requirement for the leak test which resulted from Revision No. 10 to the Certificate of Compliance No. 5805. Since the revised requirement was not identified, the required revisions to the plant special handling procedure were not implemented.

C. Corrective Actions That Have Been Taken

CP&L Special Procedure SP-82-56 was the procedure which was used for handling, loading, and unloading of the CNS-3-55 cask. This procedure was issued as valid for only a temporary period of time since the use of this cask is not routine. As the authorized time for use of this procedure expired on June 30, 1983, no action is necessary for correction of this procedure to require the leak test.

The certificates of compliance (for casks of which Brunswick is a licensed user) have been verified to be the latest revision.

Shipping personnel at Brunswick have received training on the requirements to ensure compliance with certificates of compliance on shipping casks.

The shippers' checklist form has been updated to include a requirement to review the certificate of compliance for the purpose of ensuring all requirements are met.

D. Corrective Actions to be Taken

A procedure will be implemented by November 30, 1983, to ensure revisions to certificates of compliance will be identified and appropriate procedure changes implemented.

E. Date for Full Compliance

Full compliance relative to this event will be achieved with the implementation of the procedure referenced in Section D (November 30, 1983).

Your transmittal letter relative to the subject inspection report requested additional information relative to Brunswick guidelines on LSA shipments (Item 8.c, page 4). The following information is provided:

Mr. J. P. O'Reilly

-3-

Brunswick has taken the following steps to improve packaging and inspections methods prior to shipment of strong, tight containers to improve documented compliance with requirements for LSA shipments.

- A. Retraining of E&RC shipping personnel has been performed relative to potential problems to avoid in selection of packages for type A quantity LSA shipments.
- B. Future shipments of HEPA filter units will be enclosed in crates or otherwise securely contained.
- C. Responsible E&RC supervisory personnel are currently inspecting radioactive shipments prior to release.
- D. Radioactive material shipping procedure E&RC-0510 was revised July 22, 1983, and is now undergoing another revision to reflect recent DOT and NRC regulatory changes for shipments. These revisions reflect additional LSA packaging requirements and provide additional guidance for a shipper of LSA radioactive material in a strong, tight package to assure regulatory compliance.

Very truly yours,
ORIGINAL SIGNED BY

P. W. HOWE

P. W. Howe, Vice President
Brunswick Nuclear Project

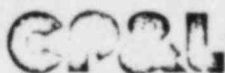
TEC/pms/LETPS1

cc: Mr. R. C. DeYoung
NRC Document Control Desk

bcc: Mr. D. L. Bensinger
Mr. J. R. Bohannon
Mr. R. M. Coats
Mr. A. B. Cutter
Mr. J. S. Dietrich/
File: B-X-545
Dr. T. S. Elleman
Mr. B. J. Furr
Mr. W. P. Guarino

Mr. R. E. Helme
Mr. L. P. Hewlett
Mr. P. C. Hopkins
Mr. P. W. Howe
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. L. E. Jones
Mr. L. H. Martin
Mr. C. H. Moseley

Mr. D. O. Myers
Mr. B. L. Parks, Jr.
Mr. J. J. Sheppard/
File: BC/A-4
Mr. R. B. Starkey, Jr.
Mr. L. V. Wagoner
Mr. J. L. Willis
Ms. M. S. Wingo
INPO



Carolina Power & Light Company

COPY

Brunswick Steam Electric Plant

P. O. Box 10429

Southport, NC 28461-0429

December 7, 1983

FILE: B09-13510C

SERIAL: BSEP/83-3782

Mr. James P. O'Reilly, Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street N.W.
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 and 2

DOCKET NO. 50-325 and 50-324

LICENSE NO. DPR-71 and DPR-62

SUPPLEMENTAL RESPONSE TO IE REPORT 324/83-23 and 325/83-23

Dear Mr. O'Reilly:

Our letter of September 23, 1983, provided a response to the violation identified in IE Report 324/83-23 and 325/83-23. The response committed CP&L to implement a procedure to ensure revisions to certificates of compliance will be identified and appropriate on-site changes implemented. The procedure was to be implemented by November 30, 1983.

Corrective action has been implemented as of October 18, 1983, which we feel satisfies the aforementioned commitment. Chem-Nuclear Systems, Inc., has established controlled copies of CNSI Cask Books at Brunswick and will issue revisions to certificates of compliance directly to us. This eliminates HE&EC having to forward the certificates of compliance from the Corporate office to Brunswick, thus eliminating the requirement for additional procedural controls.

If you have any questions concerning the above, please contact me or a member of my staff.

Very truly yours,

ORIGINAL SIGNED BY:

C. R. Dietz

C. R. Dietz, General Manager
Brunswick Steam Electric Plant

RMP/kal/LETC1

Enclosure

cc: Mr. R. C. DeYoung
NRC Document Control Desk

Mr. J. P. O'Reilly

-2-

bcc: Mr. D. L. Bensinger
Mr. J. R. Bohannon
Mr. R. M. Coats
Mr. A. B. Cutter
Mr. J. S. Dietrich/
File: B-X-545
Dr. T. S. Elleman
Mr. B. J. Furr
Mr. W. P. Guarino

Mr. R. E. Helme
Mr. L. P. Hewlett
Mr. P. C. Hopkins
Mr. P. W. Howe
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. L. E. Jones
Mr. L. H. Martin
Mr. R. E. Morgan

Mr. C. H. Moseley
Mr. D. O. Myers
Mr. B. L. Parks, Jr.
Mr. J. J. Sheppard/
File: BC/A-4
Mr. L. V. Wagoner
Mr. J. L. Willis
Ms. M. S. Wingo
INPO

CP&L

Carolina Power & Light Company

COPY

Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429
December 7, 1983

FILE: B09-13510C
SERIAL: BSEP/83-3859

Mr. James P. O'Reilly, Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street N.W.
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2
DOCKET NO. 50-325 AND 50-324
LICENSE NO. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 324/83-32 and 325/83-32 and finds that it does not contain any information of a proprietary nature.

The report identified one item that appears to be in noncompliance with NRC requirements. This item and Carolina Power & Light Company's response are provided in the following text:

Violation

Technical Specification 6.8.1.a requires written procedures be established for recommended activities in Appendix A of Regulatory Guide 1.33, November 1972. Item A.4 of Regulatory Guide 1.33 recommends that Administrative Procedures for Procedure Adherence be established.

Technical Specification 3.7.7.2 requires the deluge systems associated with the Standby Gas Treatment System to be operable; or, with one or more of the deluge systems inoperable, a fire watch must be established within one hour.

Contrary to the above, on September 1, 1983, an auxiliary operator failed to adhere to the requirements of Operating Instruction OI-13, Valve and Electrical Line-Up Verification, when he did not ensure that the component he was positioning had an identification tag as specified in Section 3.4 of the procedure. This failure resulted in improper identification of the component, a valve in the fire protection system, and this valve was improperly shut. As a result, the deluge systems of the Standby Gas Treatment System were inoperable from September 1-6, 1983, and no fire watch was established as required.

This is a Severity Level IV Violation (Supplement I.D.2).

1. Admission or Denial of Alleged Violation

CP&L concurs that the violation occurred as stated.

2. Reason for the Violation

The root cause of this event was the failure of an auxiliary operator to comply with the requirements of Operating Instruction OI-13, Valve and Electrical Line-Up Verification, by not ensuring that the component he was positioning had an identification tag as specified in Section 3.4 of the procedure. Contributory causes involve the lack of a painted color code on the subject valve and the misuse of a piping and instrument diagram. Additional details involving this event are provided in LER 2-83-83.

3. Corrective Actions Which Have Been Taken

- a. The auxiliary operator involved has received appropriate disciplinary action.
- b. Real-time training was provided to operating shift personnel concerning OI-13 and its applicability to this event.
- c. Additional real-time training was performed for Operations personnel involving methods for valve identification, actions to be taken upon discovery of an "unidentified" valve, administration of clearance procedures, proper use of P&IDs, and an integrated review of this event.

These corrective measures have resulted in a satisfactory awareness of Operations personnel to prevent future occurrences of this nature.

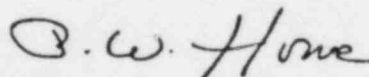
4. Corrective Actions to be Taken

Underground valves will be appropriately painted and/or labeled by December 31, 1983.

5. Date for Full Compliance

Full compliance involving this event has been achieved.

Very truly yours,



P. W. Howe, Vice President
Brunswick Nuclear Project

TEC/pms/LETPS1

cc: Mr. R. C. DeYoung
NRC Document Control Desk

bcc: Mr. D. L. Bensinger
Mr. J. R. Bohannon
Mr. R. M. Coats
Mr. A. B. Cutter
Mr. J. S. Dietrich/
File: B-X-545
Dr. T. S. Elleman
Mr. W. P. Guarino
Mr. J. L. Harness

Mr. R. E. Helme
Mr. L. P. Hewlett
Mr. P. C. Hopkins
Mr. F. J. Howe
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. L. E. Jones
Mr. L. H. Martin
Mr. R. E. Morgan

Mr. C. H. Moseley
Mr. D. O. Myers
Mr. B. L. Parks, Jr.
Mr. J. J. Sheppard/
File: BC/A-4
Mr. L. V. Wagoner
Mr. J. L. Willis
Ms. M. S. Wingo
INPO

SHNPP

ATTACHMENT 2.c.

SUPPLEMENT



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
September 2, 1983

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

NRC-III

Dear Mr. O'Reilly:

In reference to your letter of August 3, 1983, referring to RII: GFM/RLP 50-400/83-22-02, 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. B. C. Buckley (NRC)

cc: Mr. H. R. Banks
Mr. C. S. Bohanan
Mr. J. R. Bohanan
Mr. G. S. Cashell
Mr. N. J. Chiangi
Mr. A. B. Cutter
Dr. T. S. Elleman
Mr. G. L. Forehand
Mr. B. J. Furr
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. L. L. Loflin
Mr. R. L. Mayton, Jr.
Mr. S. McManus
Mr. C. H. Moseley, Jr.
Mr. R. M. Parsons
Mr. J. J. Sheppard
Mr. Sheldon D. Smith
Mr. J. L. Willis
File: HX-0544
Manager, QA Services (c/o C. L. McKenzie)

REPORTED VIOLATION:

10 CFR 50, Appendix B, Criterion V as implemented by CP&L Corporate QA Program Section 6.2.5, requires that Deficiency Reports, Deficiency and Disposition Reports, and Nonconformance Reports be controlled in accordance with procedural requirements.

Contrary to the above, on June 29, 1983, an inspection revealed that nonconformance reports are not being documented and processed in accordance with applicable procedures.

For ease of response, the violation has been subdivided as outlined below for QA/QC and NPCD portions. Response to each is provided under each heading.

QA/QC Violations (as referenced in report):

1. Multiple instances of unauthorized personnel signing disposition acceptance on DDR's and NCR's were observed. One instance was noted in which a DDR was initiated, reviewed, dispositioned, reinspected and accepted by the same QC inspector.
2. Site QA failed to review all DR's for acceptance of disposition, and to review for the reportability requirements of Part 21 and 10CFR50.55(e).
3. DDR's are not being issued in accordance with the time requirements of CQC-2, which is four days; this is a result of inspection personnel not being able to obtain DDR tracking numbers.

Construction Inspection Violation (as referenced in report):

1. Multiple instances of unauthorized personnel signing disposition acceptance on DR's were observed.

DENIAL OR ADMISSION AND REASON FOR THE VIOLATION:

QA/QC Violations:

1. The violation is correct as stated. The lead technician referenced was designated to fulfill the technical duties of the QA/QC Specialist in his absence. Since the technician had been designated, he assumed it was acceptable to sign for the Specialist to expedite processing of DDR's and NCR's. Review of approximately 150 closed DDR's indicate that other lead technicians have made similar assumptions.
2. The violation is correct as stated. QA personnel had reviewed DR's for reportability and disposition acceptability although in all cases documented evidence (i.e., initials and dates) was not shown to indicate a QA Specialist's review.
3. The violation is correct as stated. DDR's and NCR's were being initially reviewed by Supervisors to determine if a nonconformance actually existed before a number was assigned. DDR's 1684 and 1685 listed in the NRC report (as examples) were scrutinized to verify that nonconformances existed and to ensure that the nonconforming conditions were correctly and accurately stated. Several DDR's have been issued when, in fact, no nonconformance existed or the conditions were not as stated in the report. To prevent this, the supervisors were instructed to review

DDR's and NCR's to the extent necessary to minimize the number of invalid nonconformance reports entering the system. In performing these reviews, supervisors, on a few occasions, failed to comply with the procedure in respect to timely issue of nonconformance reports.

Construction Inspection Violation:

1. The violation is correct as stated with clarification. The details of the NRC Inspector's report cited "unauthorized personnel signing disposition acceptance on DR's." For the DR's in question, the corrective action and resolution details (response) were not signed by the designated authority (Principal Discipline Engineer). The resolution verification and acceptance ("disposition acceptance") sign-offs were by authorized Construction Inspection personnel.

The DR responses were developed by the "unauthorized personnel" and submitted directly to Construction Inspection. The close-out review failed to detect that the DR response did not include the sign-off of the Principal Discipline Engineer.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

QA/QC Violations:

1. Approximately 150 closed DDR's have been reviewed by the Superintendent - QC for deficiencies and acceptable issue and closure by the QA/QC Specialist. The review revealed 12 DDR's that had been either issued or closed by someone designated to sign for the QA/QC Specialist. In the 12 cases noted, the DDR had been reviewed by the QC Supervisor or the Superintendent - QC for technical adequacy prior to issue.

All closed DDR's and NCR's will be reviewed to determine those closed without the review of corrective action by the proper level of QA/QC supervision. In any case where the corrective action is found not to be acceptable as determined by QA/QC Supervisors, the item will be reopened with the issue of a new NCR or DDR, as appropriate. All open DDR's and NCR's issued without review by the proper level of QA/QC supervision will be reviewed by the QA/QC Supervisor or the QA/QC Specialist to ensure correctness. Any errors will be corrected and the nonconformance reissued. The "blanket" memorandums designating Lead Technicians authorized to sign for the QA/QC Specialist have been rescinded. New memorandums designating technicians to perform technical responsibilities assigned to QA/QC Specialists have been issued. These memorandums specifically exclude the issuing and closing of nonconformances.

2. All open DR's have been re-reviewed by the appropriate QA Specialists. These reviews have been documented on the DR's with their respective initials and dates. Additionally, closed DR's on file in the QA Records vault received a technical review by QA personnel prior to filing.

During this re-review, no conditions were encountered necessitating upgrading of the DR's to DDR's.

3. Immediate (July 1, 1983) training was held by the Director - QA/QC for all Unit supervisory personnel on review and issue of DDR's. A memorandum was issued to all Unit Supervisors on July 1, 1983 as a follow-up to the training session. Specifics of the training and memo were as follows:

- a. After completing the draft of a nonconformance, an inspector is permitted to obtain a DDR number either through his supervision or by direct contact with the individual responsible for the DDR Log.
- b. The inspector is to sign and date the DDR when he turns it over to his supervisor for review.
- c. The supervisor is responsible for a timely and thorough review of the DDR to ensure accuracy and completeness prior to issue and forwarding to engineering for evaluation.
- d. Paragraph 6.5 in Procedure CQC-2, Nonconformance Control, is to be followed without exception. Additionally, if during review the nonconformance is to be changed significantly, the changes are to be reviewed with the inspector to ensure he understands the rationale for the changes.

Construction Inspection Violation:

1. In the case of the DR's, no reworking of the closed-out reports are considered necessary due to the resolution details being found satisfactory to restore the items to approved project specifications or to meet an approved revision to the specifications. In addition, distribution of closed-out DR's are transmitted to the cognizant Principal Discipline Engineers and other management personnel through standard distribution.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER NONCOMPLIANCE:

QA/QC Violations:

1. QA/QC technicians are no longer authorized to sign for issue and closure of DDR's and NCR's. In the absence of the QA/QC specialist, the nonconformance is escalated to the QA/QC supervisor for issue and close-out.
2. Flow of DR's within QA has been streamlined to ensure that the appropriate QA individual reviews the DR's. After QA review, copies of the open DR's are maintained on file in the QA office.
3. Procedure CQC-2, Nonconformance Control is currently being revised to further clarify the responsibilities for review and issue of nonconformance reports. The training session and memorandum by the Director - QA/QC were intended to eliminate any misunderstandings related to the inspectors obtaining DDR numbers and the timely issue of DDR's.

Construction Inspection Violation:

1. The Principal Discipline Engineer in question has instructed the discipline personnel in the requirements for DR response sign-off. The Construction Inspection Unit Supervisor has issued a memo of instruction to remind the inspection personnel that existing procedures invoke DR response sign-off by the Principal Discipline Engineer.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

QA/QC Violations:

1. Review of DDR's and NCR's processed prior to this report will be completed by September 30, 1983.
2. DR review and/or evaluation is anticipated to be complete by November 4, 1983.
3. Full compliance was achieved on July 1, 1983.

Construction Inspection Violation:

1. Full compliance was achieved on August 23, 1983.

3221
Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
August 31, 1983

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

NRC-107

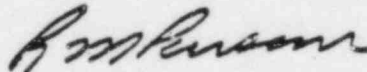
Dear Mr. O'Reilly:

In reference to your letter of August 3, 1983, referring to RII: GFM/RLP 50-400/83-22-3, 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. B. C. Buckley (NRC)

Mr. James P. O'Reilly

NRC-107

bcc: Mr. H. R. Banks
Mr. C. S. Bohanan
Mr. J. R. Bohannon
Mr. G. S. Cashell
Mr. N. J. Chiangi
Mr. A. B. Cutter
Dr. T. S. Elleman
Mr. G. L. Forehand
Mr. B. J. Furr
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. L. I. Loflin
Mr. R. L. Mayton, Jr.
Mr. S. McManus
Mr. C. H. Moseley, Jr.
Mr. R. M. Parsons
Mr. J. J. Sheppard
Mr. Sheldon D. Smith
Mr. J. L. Willis
File: HX-0544
Manager, QA Services (c/o C. L. McKenzie)

Reported Violation:

10 CFR 50, Appendix B, Criterion V as implemented by CP&L PSAR Section 1.8.5.5 and CP&L Corporate QA Program Section 6.2.5 and Construction Procedure WP-110, requires that the material used in Seismic I pipe support hangers be of the size specified on drawings, and that when drawings are not followed, inspection personnel will detect and require correction of such irregularities.

Contrary to the above, on June 30, 1983, an inspection of hanger number SA-H-123, Item Number 3, revealed that incorrect size material had been used, and that Phase I inspection personnel failed to detect and correct the incorrect hanger material size.

Denial or Admission and Reason for the Violation:

Violation is correct as stated.

Due to the time lapse between the Phase I inspection (September 24, 1982) and the Phase II inspection (June 30, 1983), and no evidence to the contrary, it is assumed that the violation is a result of inspector oversight.

Corrective Steps Taken and Results Achieved:

The material used has been evaluated and found to be acceptable as-is. Approval for the material is documented on Bergen-Paterson Pipe Support sketch A-5-236-1-SA-H-123, Revision 1S3.

Corrective Steps Taken to Avoid Further Noncompliance:

1. The inspector of record for the Phase I inspection of hanger SA-H-123 participated in the research effort to determine the cause of the violation. The research included review of inspection reports and field books, and examination of the installed material. This effort emphasized to the inspector the need for attention to detail.
2. It should be noted that Phase I inspections have been declared preliminary as discussed in our response to NRC Report RII: JWY 50-400/83-20. Phase II inspections are considered to be the inspection of record except for items which can be easily altered after inspection. Those type items will be rechecked at time of the 79-14 final walkdown. The discrepancy in the tube steel size was discovered at the time of our Phase II inspection and proper controls were exercised.

Date When Full Compliance Was Achieved:

Full compliance was achieved on August 15, 1983.

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

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

NRC-122

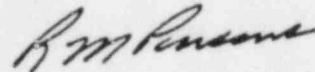
Dear Mr. O'Reilly:

In reference to your letter of September 1, 1983, referring to RII: PEF 50-400/83-24-1, 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. B. C. Buckley (NRC)

Reported Violation:

10 CFR 50, Appendix B, Criterion XVI, as implemented by PSAR paragraph 1.8.5.16, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, measures have not been established to assure that conditions adverse to quality are promptly identified and corrected in that the quality assurance program as implemented contains the following deficiencies:

1. Multiple inadequate control interfaces exist between document systems such as occurs when a condition adverse to quality is upgraded to a higher tiered corrective action system.
2. Non-quality and non-serialized documents such as punch lists are utilized to accomplish corrective actions.
3. Voiding and cancellation of quality documents are not adequately controlled within both the Construction Inspection and Quality Control systems.
4. Inspector's findings, particularly when non-quality documents such as punch lists were used, are not preserved.
5. Periodic trending of nonconformances for the purpose of determining adequacy of corrective actions, does not include all types of nonconformances generated at the site.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. CP&L concurs with the Inspector that the conditions described in the report are individual program weaknesses. The nonconformance program, during the development and review processes, was considered to be in basic compliance with the applicable criteria, as interpreted. Even though the base requirements have not changed, a need for refinement of the style and content of the program occurred without being fully met. CP&L does, however, respectfully request that the NRC consider downgrading the severity level to Level V based on the fact that in all cases actually identified by the Inspector, there was not a direct loss of control.

Corrective Steps Taken and Results Achieved:

Prior to the NRC audit on July 19-22, 1983, and the resultant violation, the overall nonconformance and corrective action program was being evaluated for consolidation into a single procedure, and for upgrading several areas considered to be in need of enhancement, some of which are in the same vein as the Inspector's findings. A composite procedure, now being developed, will address and resolve the individual weaknesses that were identified by the Inspector.

Pending issue of the new composite procedure, QA/QC Procedure CQC-2, Nonconformance Control, has been revised to delineate the process for voiding and cancelling QA/QC-generated nonconformance reports. Also, for nonconformance reports

Corrective Steps Taken and Results Achieved (cont'd.):

generated by Construction Inspection, memoranda have been issued to clarify the processing in accordance with site procedure TP-17, Construction Inspection Nonconformance Control. The memoranda pertain to nonconformance resolution and acceptance, and the issue of all nonconformance reports for dispositioning, even though the report fails to describe a nonconforming condition.

The electrical "punch lists" observed by the Inspector are being formally incorporated into site procedure TP-42, Installation of Safety Related or Seismically Installed Raceways and Components, which will change the "punch list" to an inspection report and an official QA record.

Corrective Steps Taken to Avoid Further Noncompliance:

The new nonconformance and corrective action procedure, in addition to correcting the weaknesses, will contain guidance in the use and disposition of documents considered to be part of nonconformance handling, even though the documents (e.g., punch lists, travelers) are part of a work or inspection procedure.

Date When Full Compliance Will Be Achieved:

Issue of the new nonconformance and corrective action procedure is scheduled for December 15, 1983. Full compliance for all aspects of the violation will be completed by February 1, 1984.



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
November 18, 1983

NRC-145
Serial LAP-83-535

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

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NOS. 1 AND 2
DOCKET NOS. 50-400 AND 50-401
IE INSPECTION REPORT NOS. 50-400/83-25 AND 50-401/83-25

Dear Mr. O'Reilly:

Carolina Power & Light Company (CP&L) has received Mr. R. C. Lewis' letter dated October 19, 1983 which documents the results of the special Regional Construction Assessment Team inspection conducted by Mr. P. R. Bemis on August 15-26, 1983.

We consider this inspection to be one of the most thorough reviews conducted of our Harris Project Activities, and appreciated the professionalism and high degree of expertise with which it was conducted. The findings and observations noted in the above report, and discussed at the exit critique, are being given management attention as we continue our internal evaluations of program improvements. In addition to the items covered in your letter, we would like to take notice of a number of strengths found by your assessment team and discussed at the critique:

1. Project management meetings, such as the project review meeting, are oriented towards the resolution of problems. The meetings focus on the identification of the problems and the agreement of how to attack and resolve the problems. The responsibility to handle the tasks is clearly defined when problems emerge.
2. The warehouse storage program is well developed, and the use of operations personnel to insure that operations equipment has adequate preventive maintenance while in storage is a very positive aspect.
3. There is an on-site engineering group - Harris Plant Engineering Section - which provides design self-sufficiency.
4. There is a mechanism to incorporate industry experience feedback into the nuclear power plant design.
5. The technical audits conducted by CP&L of the Architect Engineer (Ebasco) are of substance and are over and above the required programmatic audits.

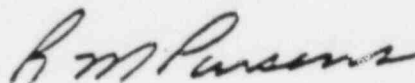
6. The electrical construction inspectors are considered to be very knowledgeable and conscientious in their work areas.
7. Management is actively involved in getting problems associated with concrete placement addressed and corrected.
8. Engineers are extremely responsive in addressing concerns raised by the NRC.

In addition to the strengths noted above, we acknowledge the seven violations that were identified. We herewith submit (Attachment) our responses to violations in accordance with the provisions of 10 CFR 2.201.

We consider that the corrective actions taken are satisfactory for the resolution of the items.

Thank you for the 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. B. C. Buckley (NRC)

Mr. James P. O'Reilly

NRC-145

bcc: Mr. H. R. Banks
Mr. C. S. Bohanan
Mr. H. R. Bowles
Mr. C. Carmichael (2)
Mr. G. S. Cashell
Mr. N. J. Chiangi
Mr. A. B. Cutter
Dr. T. S. Elleman
Ms. S. F. Flynn
Mr. G. L. Forehand
Mr. J. F. Garibaldi (Ebasco)
Mr. J. L. Harness
Mr. P. C. Hopkins
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. S. A. Laur
Mr. L. I. Loflin
Mr. R. E. Lumsden
Mr. R. L. Mayton, Jr.
Mr. S. McManus
Mr. C. H. Moseley, Jr.
Mr. D. L. Nordstrom (LIS)
Mr. R. M. Parsons
Mr. J. J. Sheppard
Mr. Sheldon D. Smith
Mr. A. C. Tollison
Mr. R. A. Watson
Ms. M. A. Weaver (Westinghouse)
Mr. J. L. Willis
Mr. T. A. Baxter (Shaw, Pittman, Potts & Trowbridge)
Mr. M. F. Thompson
File: HI/A-2D
File: H-X-0544

ATTACHMENT

Responses to Violation Identified During
the Inspection Conducted on August 15-26, 1983
(IE Inspection Report Nos. 50/400/401/83-25)

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
1E Inspection Report 50-400/401/83-25
Violation A

Reported Violation:

10 CFR 50, Appendix B, Criterion X, as implemented by the Carolina Power & Light PSAR Section 1.8.5.10, requires that inspection of activities affecting quality shall be executed to verify conformance with the documented instructions. Construction procedures TP-28 and WP-105 are the Harris site instructions that are used in the installation inspection of safety-related equipment.

Contrary to the above instructions, the installation inspection, which was performed for Motor Control Centers (MCCs) 1A35-SA and 1B35-SB was inadequate in its execution in that inspection failed to identify the following:

1. The MCC hold-down fasteners were not tightened.
2. The MCC elevation checks were not adequately performed.
3. The welding of the MCC mounting sill to embedded plates differed from the requirements on the vendor plan which was referenced on the welding instruction.

This is a Severity Level IV Violation (Supplement II), and is applicable to Unit 1 only.

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

1. The fasteners were loose because either they were not checked closely enough or they were loosened by others who may have performed work on the MCCs after the inspection by CI.
2. Elevations were checked indirectly by CI inspector by verifying previous sign off of pad elevation by Civil CI when pad/embeds were installed.
3. The QC Structural Welding inspector inspected the weldments in question as per the vendor drawings minimum weld size 1/4" x 1/4" x 3". Using the 1A4 welding process and a 1/8" E-7018 electrode, an acceptable 1/4" fillet weld was not attained. Therefore, to reach the required weld size, multiple passes were performed. The QC Inspector should have requested clarification before performing the final inspection.

Corrective Steps Taken and Results Achieved:

1. All fasteners in MCCs under the scope of Regulatory Guide 1.29 have been reinspected under Tr-28. Discrepancies were noted and are being resolved.

2. Procedural steps under WP-105 and TP-28 have been initiated to recheck the elevation of all MCCs under the scope of Regulatory Guide 1.29 against vendor, Ebasco, or CP&L approved design documents. This recheck is expected to be complete by December 1, 1983.
3. Motor Control Center mounting sill weldments were evaluated by Harris Plant Engineering Section and were found to be structurally sound. FCR-AS-3914 (approved October 27, 1983) was issued to allow for multiple weld passes to attain the required weld size.

Corrective Steps Taken to Avoid Further Noncompliance:

1. (a) Additional training of inspection personnel involved in inspection of MCCs was conducted by the lead inspector on October 28, 1983 emphasizing closer inspection of MCC fasteners for correct tightness under TP-28.

(b) Exhibit 12, WP-105, is now being used to have CI check the results of work performed on equipment that has been disassembled. Exhibit 12, WP-105, is used for special assembly of equipment. This exhibit will be required to be initiated if equipment has to be disassembled to facilitate installation and has to be reassembled after installation.
2. Inspection personnel involved with inspection of MCCs received training by the lead inspector on October 28, 1983 on the requirements for elevation checks against vendor, Ebasco, or CP&L approved design documents.
3. QC structural welding inspection personnel have been instructed to follow applicable inspection criteria (i.e., FCR's, DCN's, PW's, Vendor and Engineering related drawings). If conflicts arise, inspectors will request clarification of information prior to performing inspection.

Date When Full Compliance Will Be Achieved:

1. & 2. Full compliance will be achieved on December 1, 1983.
3. Full compliance was achieved on October 28, 1983.

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
IE Inspection Report 50-400/401/83-25
Violation B

Reported Violation:

10 CFR 50, Appendix B, Criterion V, as implemented by Carolina Power & Light Company PSAR, Section 1.8.5.5, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, and drawings.

1. Pipe support drawing SW-H-456, Revision 4/D, required two piece 1's, 4 x 4 tubing, to be welded to a steel tube of support SW-H-366 with a 1/4" fillet welded all around both piece 1's.
2. Pipe support drawing SW-H-456, Revision 4/D, required a 1/16" clearance between the support and the top and both sides of its pipe.
3. WP-110, Revision 8, paragraph 3.4, requires documentation of pipe support stock substitutions. The strut for support SW-H-946 was required to be welded to support SW-H-944.
4. Procedure MP-05, Revision 18, paragraph 4.6, required welders to identify their work at the time of fit-ups or before fit-up begins.

Contrary to the above,

1. One of the support SW-H-456 piece 1's was not welded on one of its four sides.
2. There was less than 1/32" clearance between support SW-H-456 and the top of the pipe it supported.
3. The strut for support SW-H-943 was used in support SW-H-946 and welded to support SW-H-944. The strut for support SW-H-942 was used in support SW-H-943. The strut for support SW-H-946 was used in support SW-H-942. The licensee was unable to provide documentation authorizing the above noted material substitutions.
4. There was no discernible evidence that the welder(s) had stamped their stencils on field welds C1-255-M-22-FW3, C1-236-1-SI-244-FW-601, and FW-597-598, 599, 600 (tack welds on code plate of SI penetration).

This is a Severity Level V Violation (Supplement II), and is applicable to Unit 1 only.

Denial or Admission and Reason for the Violation:

The violation is correct as stated, with the following clarifications:

1. Pipe hanger SW-E-456 is a box frame hanger attached to a large existing Service Water pipe hanger. It was to have all around 1/4" fillet welds connecting two items #1 (4 x 4 tube steel) to an existing 6 x 6 tube steel member of SW-E-366. The welds were only performed on three sides leaving off the inside welds.

It appears the inspector accepted the joint knowing the welds were deleted, per FCR-E-564. The FCR allows the deletion of the inside window welds for box frame hangers on 12" and smaller pipe when the members require all around fillet welds. Due to the configuration of this hanger, the inspector thought that the FCR was applicable. In the case of the reported joints, the FCR is not applicable.

2. Hanger SW-E-456, Rev. 4/D, was inspected to Phase II by the C.I. Inspector (Hanger Q.C. Inspector). It appears that during this inspector's review, he inadvertently failed to detect the specified design clearance requirement violation. It appears that an error occurred in reading or recording the dimension. Therefore, the reason for the violation is considered to be a physical inspection error.
3. For hangers SW-E-942, 943 & 946, although a material substitution violation is acknowledged, the violation, as stated, is misleading. The violation stated that "the strut" was substituted in each case without the proper documentation when, in fact, it was not the strut but rather the pipe clamp which was substituted.

WP-110, Rev. 8, paragraph 3.4, requires documentation of pipe support stock substitutions. Apparently, due to the fact that all three (3) hangers (SW-E-942, 943, and 946) require the same type and size pipe clamp, the inspector failed to realize a violation of site procedure had been made. The records suggest that the inspector made a document review error as opposed to a physical inspection error.

4. In reference to the NRC reported violation that on weld joints C1-255-M-22-FW3; C1-236-1-SI-244 FW 601; and the tack welds on the code plate of containment penetration #M-22 reported as FW597, 598, 599, 600, the welder(s) had not stamped their welds; a further investigation into the details has been performed by Welding Engineering.

ISI-244 FW 597, 598, 599, 600, which are socket welds identified on isometric ISI244, were not welded at the time of the NRC audit and were mistakenly identified by the NRC report as the four (4) tack welds attaching a Code data plate to the containment penetration #M-22. This Code data plate was moved to a new location on the penetration in 1981 for which a WDR was generated which is presently in the Q.A. Records Vault.

On August 26, 1983, Welding Engineering was notified of the NRC Inspector's reported violations on containment penetration weld joint #C1-255-M-22-FW3, 3" diameter pipe weld joint #C1-236-1-SI-244-FW601, and the four (4) tack welds connecting the Code data plate to the containment

penetration #M-22. The Senior Engineer, Metallurgy/Welding, immediately requested a CP&L Q. C. Lead Technician and a Welding Engineering Supervisor to accompany him and assist in investigating the details. Upon arrival at the weld joints, the Welding Engineering Supervisor and the Q.C. Technician located the stencils which had been stamped at the penetration weld joint #C1-255-M-22 FW3 (stencils #B-79, #C-79) and the stencil which had been stamped at the penetration code plate tack welds (stencils #F-16). It was, however, verified that welder #C-79 had forgotten to stamp pipe weld joint #C1-236-1-SI-244-FW601; as required by site procedure MP-05. It should be noted, however, that it is not a Code violation.

Corrective Steps Taken and Results Achieved:

1. After the violation was discovered, the hanger was placed on DDR #1919, Deficiency Report. It was then evaluated by Harris Plant Engineering and the joint was found to be acceptable "as is". The hanger design drawing was revised to reflect the as-built condition.
2. The condition was identified and reported for hanger SW-H-456, Rev. 4/D, and documented on DR No. H-273.

Hanger SW-H-456, Rev. 4/D, will be reworked to correct the improper pipe to support member clearance.

3. Due to the fact that all three (3) hangers involved (SW-H-942, 943, and 946) required by design the identical type and size clamps and the clamps are all standard catalogue parts, the interchange is acceptable "as is".
4. DDR 1933 was generated on August 26, 1983 to document the failure of C-79 to stencil pipe weld joint #1SI244 FW601. Working to the Corrective Action Report of the DDR, the pipe weld joint was stamped as required by MP-05.

Corrective Steps Taken to Avoid Further Noncompliance:

1. WP-110 shall be revised to discourage the use of generic FCR's (i.e., FCR-H-564) by the craft or the inspector for installation and inspection.
2. For hanger SW-H-456, Rev. 4/D, the C.I. Inspector ceased employment in the Pipe Hanger C.I. Unit (unrelated to this incident) and transferred to a different C.I. discipline. Due to the relatively short time frame from the issuance of the noncompliance report to the inspector's transfer, only a verbal reemphasis of procedures was performed. If the inspector had remained in the group, he would have undergone a documented and formal retraining relative to the noncompliance. Site policy has been reemphasized to all Pipe Hanger C.I. Inspectors to assure that they understand Phase II Inspection procedures and criteria.
3. The use of catalog parts shall be in accordance with design. This shall be verified at the point of installation. WP-110 and TP-34 shall be revised to clearly state these requirements.

4. Welder C-79 was issued a written reprimand and reoriented to MP-05 by his supervisor.

Date When Full Compliance Will Be Achieved:

- 1 - 3. Full compliance will be achieved on December 15, 1983.
4. Full compliance was achieved on September 2, 1983.

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
IE Inspection Report 50-400/401/83-25
Violation C

Reported Violation

10 CFR 50, Appendix B, Criterion V, requires that procedures written for activities affecting quality be followed, FSAR, Section 1.8, commits to Regulatory Guide 1.28 which endorses ANSI Standard N45.2. Section VI of the standard defines the same requirements as Criterion V. Quality procedures AP-XIII-05, Appendix A, requires that the Senior Lead Engineer will, for each shipment, check for storage requirements from the vendor.

Contrary to the above, as of August 24, 1983, quality procedures were not followed in that the Senior Lead Engineer had not checked the vendor storage requirements for HEPA filters designated for use in safety-related HVAC filtration units. These filters were not stored in accordance with vendor instructions.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The vendor storage requirements were not on site.

Corrective Steps Taken and Results Achieved:

The HEPA filters have been inspected to insure that no damage occurred because of the previous improper storage. None was found. The filters were restacked to comply with the requirements of ANSI N509-1976. The vendor requirements for storage are not on site, but at the time of the discovery of the violation, the NRC Inspector called the vendor. The vendor said his storage requirements were the same as ANSI N509-1976.

Corrective Steps Taken to Avoid Further Noncompliance:

The material storage procedure AP-XII-05 was revised to include the specific storage requirements for HEPA filters as described in ANSI N509-1976.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on November 10, 1983.

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
IE Inspection Report 50-400/401/83-25
Violation D

Reported Violation:

10 CFR 50, Appendix B, Criterion V, requires activities affecting quality shall be accomplished in accordance with procedures, drawings, etc. Carolina Power & Light Company procedure CQA-4, Revision 5, QA Records, Attachment 1, identifies radiographs as QA records. Paragraph 7.7.2 requires special process records such as radiographs and microfilms to be packaged and stored to prevent damage due to temperature, humidity, light, etc.

Contrary to the above, radiographic film had been stored in the Superintendent's QA office, outside the vault, for approximately two weeks.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The volume of radiographs received on site in a limited period of time exceeded available storage in the QA Records Vault. Timely rearrangement of vault storage was not taken.

Corrective Steps Taken and Results Achieved:

Radiographs were transferred to the vault on October 14, 1983. (The vault rearrangement was completed the same day.) The radiographs were removed from the sealed packing crates and placed in the radiograph storage cabinets the next two days and are now stored according to requirements.

Corrective Steps Taken to Avoid Further Noncompliance:

Any future receipts of radiographs which exceed QA Records' storage capacity will be stored in the Harris Plant Document Control vault which is the permanent QA Records' storage facility for the plant.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 14, 1983.

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
IE Inspection Report 50-400/401/83-25
Violation E

Reported Violation:

10 CFR 50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as deficiencies, deviations, and nonconformances are promptly identified and corrected.

Contrary to the above, the Shearon Harris Plant Engineering Organization did not have a procedure for identifying and correcting deficiencies, deviations, and nonconformances. In addition, during re-performance of calculations for pipe support CH-H-1030, the designer noted a violation of AISC requirements in the original calculations. The support was redesigned but the violation was not identified to the original designer (A/E-contractor), nor evaluated for potential generic significance.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The Harris Plant Engineering Sections uses departmental and Corporate procedures for identifying and correcting deficiencies, deviations, and nonconformances. NPED procedures, and the procedures applicable to specific design efforts such as on-site hanger design, incorporate the design control requirements of ANSI N45.2-11. NPED procedures for evaluating nonconformances under 10 CFR 50.55(e) and 10 CFR 21 are part of the mandatory training for all design personnel. Criterion XVI, 10 CFR 50, Appendix B, requires that significant conditions adverse to quality be documented and reported, and the NPED procedures reflect this requirement. Also, please note that the specific design question concerning a pipe support, which was identified during this audit, was neither "significant" nor "adverse to quality". If the design had not been revised, the support would have performed the design function.

Corrective Steps Taken and Results Achieved:

Each applicable HPES employee has been reminded of our procedural commitments (NPED 3.9); however, due to the nature of the specifically identified concern (e.g., not significant), no further specific action for the particular item is deemed appropriate.

Corrective Steps Taken to Avoid Further Noncompliance:

A Section Instruction is scheduled for issuance by November 30, 1983. The purpose of this Instruction is to more clearly define specific actions to be taken by HPES personnel when nonconformances are identified.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved on November 30, 1983.

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
IE Inspection Report 50-400/401/83-25
Violation F

Reported Violation:

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by and performed in accordance with instructions, procedures, or drawings.

1. FSAR, Section 1.8, page 50, commits to compliance with NRC Regulatory Guide 1.38 and ANSI N45.2.2-1972. AP-XIII-05, Revision 12, requires the reactor internals to be stored in accordance with the manufacturer's instructions. The NSSS Component Receiving and Storage Criteria, dated March 1976, states that storage criteria was in accordance with ANSI N45.2.2-1972. During inspection of the storage condition for the upper reactor internals stored in the reactor vessel and an inspection of storage areas in the auxiliary building, the following items were noted:
 - a. ANSI N45.2.2-1982, paragraph 6.2.1, required access control to storage areas.
 - b. ANSI N45.2.2-1972, paragraph 6.2.2, required storage areas to be cleaned to avoid accumulation of trash, discarded packaging materials, and other detrimental soil.
 - c. ANSI N45.2.2-1972, paragraph 6.3.3, prohibits the storage of hazardous chemicals in close proximity to important nuclear items.

Contrary to the above:

- a.
 - (1) On July 23, 1983, and twice on July 25, 1983, the materials storage area in the auxiliary building was found unlocked and without an attendant.
 - (2) The storage area for the reactor internals was not posted as a controlled area and unrestricted access to the storage area was observed.
 - b. Underneath the reactor upper internals cover and on the upper internals, over six wads of used tape, two rolls of tape, and cleaning cloth were observed. In addition, the RV flange was not protected and numerous cigarette butts were observed on the RV flange grooves.
 - c. A can of cutting fluid was observed to be stored on top of the upper reactor internals and underneath its canvas protective cover.
2. On August 25, 1983, a craftsman working on the upper internals lifting rig informed the inspector that he had taped over the spray nozzle holes of the upper internals because he was concerned about dropping something into the holes while working above them. He further stated that he determined how deep the holes were by dropping a nut tied to a string into the holes.

Contrary to the above, the craftsman did not have a procedure for determining the depth of the holes and for taping the holes.

This is a Severity Level V Violation (Supplement II), and is applicable to Unit 1 only.

Denial or Admission and Reason for the Violation:

The violation is correct as stated with the following exception:

The lower internals cannot be interpreted as being in a stored area with respect to access control. Permanent plant locations are considered storage locations by site policy with the exception of access control. Access control for materials and equipment in its permanent plant location is controlled by procedure on a case-by-case basis. The violation occurred because of failure to implement the policy and the inflexibility of the procedure.

Corrective Steps Taken and Results Achieved:

Valve storage areas and the reactor vessel internals storage area are being locked during non-working hours and during times when access to the areas is not required.

Valve storage areas have signs posted at the entrance allowing authorized personnel only to enter the area as well as forbidding the use of tobacco, food or beverages.

The reactor vessel internals have been cleaned of subject debris, and stored in the reactor vessel which is in a relatively isolated area. Polyethylene has been used to seal the internals inside the vessel and a barricade was installed with a lockable door to restrict access. A sign was placed at the entrance designating the area as Zone 4.

The work being done on the vessel internals by the craftsman without a procedure will be eliminated by the new access control for the area. Also, management has reemphasized placing covers over accesses to equipment, piping systems, etc. where the entrance of foreign objects could cause potential problems.

Corrective Steps Taken to Avoid Further Noncompliance:

Procedure AP-X-02 has been reviewed and found to be compatible with ANSI standards governing housekeeping requirements. Management has emphasized the importance of compliance with this procedure to all personnel.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on November 10, 1963.

Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
IE Inspection Report 50-400/401/83-25
Violation G

Reported Violation:

10 CFR 50, Appendix B, Criterion V, as implemented by Carolina Power & Light Company, PSAR, Section 1.8.5.5, requires in part that activities affecting quality shall be prescribed by documented instructions and procedures of a type appropriate to the circumstances. Contrary to this requirement, the following civil procedure instructions were not appropriate for the circumstances as described below:

1. Procedure TP-32, Structural Steel Inspection, requires that extra flat washers be used on oversize holes, but does not provide for instructions or documentation for inspectors to inspect and document oversize holes.
2. Procedure WP-28 does not adequately prescribe instructions for the hand methods being used to mix grout in that it does not stress the importance of blending cement and sand before adding water and it prescribes that grout be mixed in a truck or paddle mixer.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

1. The requirement to inspect for oversize holes was inadvertently omitted from the procedure (TP-32).
2. The paragraph of WP-29 which is in question, 3.10.2, concerns dry pack grout, and states grout will be mixed by mixer or by hand. For actual mixing instructions, it references paragraph 3.12.2 which covers controlled shrinkage grout. Paragraph 3.12.2, however, states mixing shall be by paddle mixer or by truck, which contradicts paragraph 3.10.2.

Detailed instructions for hand mixing were not included in 3.10.2 except to require thorough mixing of the ingredients - cement, sand, and water.

Corrective Steps Taken and Results Achieved:

1. Deviation Notice No. 2 was written to TP-32, Rev. 5, establishing procedural requirements for inspection and documentation of bolt holes sizes on August 26, 1983 and is now being used by field inspection personnel. DR-AS-300 was written on September 1, 1983 addressing the possibility that high strength bolts may have been installed in oversized holes without the required hardened washers over the holes. PW-AS-3624 was approved on September 1, 1983 resolving this discrepancy.

2. Procedure WP-29 was revised by Procedure Deviation Notice No. 6 on August 23, 1983 to delete requirement for mixing dry pack grout with a paddle mixer. Deviation Notice No. 7 was approved on August 25, 1983 adding the requirement for thoroughly blending the sand and cement before water is added.

Corrective Steps Taken to Avoid Further Noncompliance:

1. TP-32, Rev. 6, approved on November 4, 1983, includes inspection for oversized holes in the erection phase and a check during the bolting phase for oversized holes which may result from reaming and drilling.
2. Work Procedure revisions. (See Corrective Steps Taken and Results Achieved.)

Date When Full Compliance Will Be Achieved:

Full Compliance was achieved on November 4, 1983.

(8515PSA cfr)

Shearon Harris Nuclear Power Plant
P. O. Box 101, New Hill, N. C. 27562
November 30, 1983

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

NRC-147

Dear Mr. O'Reilly:

In our November 18, 1983 response to IE Inspection Report 50-400/401/83-25, we committed to having our corrective action for Violation A completed by December 1, 1983 and corrective action for Violation E completed by November 30, 1983. This letter is to notify you that we will require additional time to complete our commitments.

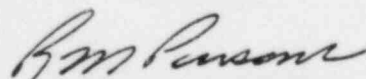
Violation A (Part 1): All fasteners in MCC's under the scope of Regulatory Guide 1.29 were reinspected to ensure tightness under TP-28. Discrepancies were noted and resolution was projected to be complete by December 1, 1983. The vendor has been requested to evaluate the discrepancies and recommend corrective action. The vendor's resolution is expected by January 1, 1984. In order to complete any rework which may be necessary, we will require until January 31, 1984 to be in full compliance with our commitment.

Violation A (Part 2): Procedural steps were initiated to recheck the elevation of all MCC's under the scope of Regulatory Guide 1.29 against vendor, Ebasco, or CP&I, approved design documents. This recheck was expected to be complete by December 1, 1983. It has been determined that since there is no elevation specified by the vendor or Ebasco drawings for the MCC's, and the equipment pads were previously checked by Civil CI, an elevation check for these MCC's is not considered necessary. WP-105 and TP-28 are being revised to reflect this. The approval of these procedure changes should be complete and full compliance achieved by January 1, 1984.

Violation E: A Section Instruction was scheduled for issuance by November 30, 1983, but due to review cycle delays and an identified concern to assure that Section Instructions and Departmental Procedures are compatible, it is necessary to extend the expected completion date of this item from November 30, 1983 to January 31, 1984 to be in full compliance with our commitment.

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: Messrs. G. Maxwell/R. Prevatte (NRC-SHNPP)
Mr. B. C. Buckley (NRC)

Mr. James P. O'Reilly

NRC-147

bcc: Mr. H. R. Banks
Mr. C. S. Bohanan
Mr. H. R. Bowles
Mr. C. Carmichael (2)
Mr. G. S. Cashell
Mr. N. J. Chiangi
Mr. A. B. Cutter
Dr. T. S. Elleman
Ms. S. F. Flynn
Mr. G. L. Forehand
Mr. J. F. Garibaldi (Ebasco)
Mr. J. L. Harness
Mr. P. C. Hopkins
Dr. J. D. E. Jeffries
Mr. I. A. Johnson
Mr. S. A. Laur
Mr. L. I. Loflin
Mr. R. E. Lumsden
Mr. R. L. Mayton, Jr.
Mr. S. McManus
Mr. C. H. Moseley, Jr.
Mr. D. L. Nordstrom (LIS)
Mr. R. M. Parsons
Mr. J. J. Sheppard
Mr. Sheldon D. Smith
Mr. A. C. Tollison
Mr. R. A. Watson
Ms. M. A. Weaver (Westinghouse)
Mr. J. L. Willis
Mr. T. A. Baxter (Shaw, Pittman, Potts & Trowbridge)
Mr. M. F. Thompson
File: HI/A-2D
File: H-X-0544

P. O. Box 101, New Hill, N. C. 27562

October 21, 1983

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

NRC-130

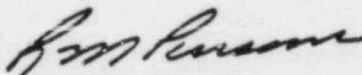
Dear Mr. O'Reilly:

In reference to your letter of September 22, 1983, referring to RII: GFM/RLP 50-400/83-26-01, 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. B. C. Buckley (NRC)

Reported Violation:

10 CFR 50, Appendix B, Criterion II, as implemented by CP&L PSAR Section 1.8.5.2 and CP&L Corporate QA Program Section 1.3, requires that activities such as piping installation inspections be conducted and controlled in accordance with detailed procedural requirements.

Contrary to the above, on August 18, 1983, instances were found which indicated that piping installations were assigned to be inspected without detailed procedures, appropriately controlled drawings, and indoctrination of inspection personnel as to inspection and documentation requirements. The inspection was to determine construction completion and acceptance of a section of service water piping system prior to turnover to the Operations Department. The deficient examples included: use of marked-up inspection drawings, unauthorized entries on inspection forms, inadequate procedural requirements, lack of established acceptance criteria, and inspections requested prior to work completion.

This is a Severity Level IV Violation (Supplement II.D).

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The conditions reported by the Inspector were caused primarily from merging "as-built" functions into a quality inspection procedure. This resulted in differing interpretations of the required procedure content and manner of implementation.

Corrective Steps Taken and Results Achieved:

Site procedure TP-24, Mechanical Pipe Installation Inspection, has been revised as follows:

1. As-built drawings are no longer used in the inspection process. Acceptance of piping geometry and configuration is based upon criteria contained in approved design installation drawings.
2. The exposed piping inspection form, Exhibit 2, no longer requires the use of as-built drawings to be listed as part of the inspection package. Inspection personnel have been instructed that the exhibit is the responsibility of the mechanical engineer to prepare and revise, if needed.
3. The reference to "spot" check in the procedure has been deleted. The dimensional and geometrical checks performed by the inspection personnel are now full inspections.
4. The procedure clarifies that closure welds (versus all welding) are to be completed prior to inspection for dimensions and geometry.
5. The procedure no longer addresses the use of punch lists. The previous punch list exhibit to the procedure has been deleted. TP-24 continues to invoke TP-17; Construction Inspection Nonconformance Control, for processing nonconforming conditions.

Corrective Steps Taken to Avoid Further Noncompliance:

The revision to TP-24 eliminated the as-built functions, and clarifies the procedure content to enhance proper interpretations and implementing actions.

The mechanical engineering and inspection personnel have been instructed in the revised procedure.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 17, 1983.

H-X-0544

P. O. Box 101, New Hill, N. C. 27562
December 9, 1983

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

NRC-152

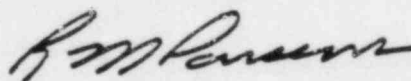
Dear Mr. O'Reilly:

In reference to your letter of November 10, 1983, referring to RII: GFM/RLP 50-400/83-29, 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

RMF/sh

Attachment

cc: Messrs. G. Maxwell/R. Prevatte (NRC-SHNPP)
Mr. B. C. Buckley (NRC)

Mr. James P. O'Reilly

NRC-152

bcc: Mr. H. R. Banks
Mr. C. S. Bohanan
Mr. H. W. Bowles
Mr. C. Carmichael (2)
Mr. G. S. Cashell
Mr. N. J. Chiangi
Mr. A. B. Cutter
Dr. T. S. Elleman
Ms. S. F. Flynn
Mr. G. L. Forehand
Mr. J. F. Garibaldi (Ebasco)
Mr. J. L. Harness
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Mr. R. A. Watson
Ms. M. A. Weaver (Westinghouse)
Mr. J. L. Willis
Mr. T. A. Baxter (Shaw, Pittman, Potts & Trowbridge)
Mr. M. F. Thompson
File: HI/A-2D
File: H-X-0544

Reported Violation:

10 CFR 50, Appendix B, Criterion VIII, as implemented by PSAR Section 1.8.5.8 and CP&L Corporate QA Program Section 5.2, requires that materials used on "Q" class components and systems be purchased, issued and controlled in accordance with applicable codes, standards, specifications, criteria and other special requirements.

Contrary to the above, on August 24, 1983, it was found that non-"Q" class bolting material was being used during the installation and assembly of a "Q" class system. The known affected systems are fire protection and radiation waste. This practice also involves bolting material used in other safety systems prior to April 1983.

This is a Severity Level IV Violation (Supplement II.D).

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The problem addressed by this violation consists of two parts:

1. Bolts purchased for "Q" applications are required to have a Certificate of Conformance from the vendor; however, since they are considered "commercial grade" items, source approval is not required. Bolts for non-Q applications require no Certificate of Conformance but in all other respects meet the same standards as "Q" bolts. Since Q and non-Q bolts are identical (if of the same type and grade), they are not distinguishable beyond receipt under the existing program at the Harris site.
2. Bolts specified for some "Q" applications are manufactured with no distinguishing marks which would prevent them from being replaced by bolts of a lesser quality or grade which are also unmarked.

Corrective Steps Taken and Results Achieved:

1. Site purchased bolts are considered acceptable for the specified application. While the specified documentation may be in question for bolts in some "Q" applications, material quality is not a concern. Therefore, no further corrective action is necessary.
2. Investigations are underway to determine the acceptability of bolting materials in the various disciplines, i.e., to determine whether bolts of a lower grade than required have been installed.

Corrective Steps Taken to Avoid Further Noncompliance:

1. Only "Q" bolts will be purchased, therefore eliminating the need for distinguishing "Q" bolts from "non-Q" bolts.
2. Site specifications are being revised where necessary to allow the substitution of bolts which are marked as standard practice for those which are not already marked or easily identifiable by shape, manufacturer's mark, etc. Where substitutions are not allowed, bolts will be marked upon receipt. The approved marking will be a requirement for acceptance during installation inspection. Unmarked bolts are no longer being ordered.

Date When Full Compliance Will Be Achieved:

The required revisions to site specifications are projected to be complete by February 1, 1984. In order to complete our investigation of installed bolts and corrective actions as necessary, it is projected that full compliance of all aspects will be achieved by June 1, 1984.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

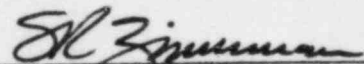
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H.B. Robinson Steam Electric Plant,)	ASLBP No. 83-484-03LA
Unit 2))	

AFFIDAVIT OF S. R. ZIMMERMAN

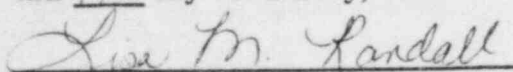
WAKE COUNTY)
NORTH CAROLINA)

S. R. Zimmerman, being duly sworn according to law, deposes and says that he is Manager-Nuclear Licensing Section with Carolina Power & Light Company; that the supplements to Applicant's answers to Interrogatory Nos. 1-30 and 1-31 contained in Supplement to Applicant's Answers to the Hartsville Group First Set of Interrogatories to Applicant, are true and correct to the best of his knowledge, information and belief, and that the sources of his information are officers and employees of Carolina Power & Light Company.



S. R. Zimmerman

Sworn to and subscribed before me
this 17th day of January, 1984.



Notary Public

My commission expires: 5/18/88

