

CP&L

Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562  
November 11, 1983

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

NRC-140

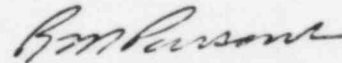
Dear Mr. O'Reilly:

In reference to your letter of October 19, 1983, referring to RII: PRB 50-400/83-25-07, 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)

**Attachment to CP&L Letter of Response to NRC Report RII: PRB 50-400/83-25-07**

**Reported Violation:**

10 CFR 50, Appendix B, Criterion V, as implemented by Carolina Power and 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-29 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 hole 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.