

USNRC
CP&L
Carolina Power & Light Company

P.O. Box 10, 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

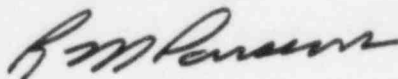
Dear Mr. O'Reilly:

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

RMP/sh

Attachment

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

8401050390 831222
PDR ADOCK 05000400
Q PDR

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.