



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
March 30, 1984

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

NRC-200

Dear Mr. O'Reilly:

In reference to your letter of March 2, 1984, referring to RII: GFM/RLP 50-400/84-07-03, 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)

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PDR ADOCK 05000400
Q PDR

Attachment to CP&L Letter of Response to NRC Report RII: GFM/RLP 50-400/84-07-03

Reported Violation:

10 CFR 50.55(f)(1) requires CP&L to implement the quality assurance program described or referenced in the Preliminary Safety Analysis Report. Section 1.8.5.5 of the CP&L Quality Assurance Program requires that activities affecting quality be accomplished in accordance with documented instructions, procedures or drawings.

Contrary to the above, CP&L failed to require documented procedures be provided to assure that the periodic maintenance was performed on the 125 VDC emergency batteries from July 1983 until late October 1983.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The batteries were received on site in December 1982 and were installed in May of 1983. The turnover of the batteries to the Operations Section occurred in July 1983. In this case, there was no Preventive Maintenance required by the manufacturer prior to initial charge of the battery, which occurred on August 16, 1983. A Surveillance Test for the batteries based on the draft technical specifications had been developed and approved prior to turnover of the batteries. However, all portions of this test were not applicable to the batteries in their current status, and preventive maintenance activities were performed using appropriate portions of the test procedure and based upon the requirements of the technical manual. The noted violation is felt to be an isolated exception that was caused by the fact that maintenance was not required to be started until after turnover to Operations.

Corrective Steps Taken and Results Achieved:

Because preventive maintenance was performed, there has been no degradation of the battery.

Procedure MMM-14, Rev. 1, Maintenance/Protection of Permanent Plant Equipment After RFT Acceptance by SHNPP Start-up Group, was approved on October 5, 1983. It requires that Operations maintenance personnel initiate maintenance logs using base data from the Equipment In Storage Maintenance Sheet and Maintenance Logs generated per WP-106, Maintenance/Protection of Permanent Plant Equipment.

Corrective Steps Taken to Avoid Further Noncompliances:

In order to ensure that Preventive Maintenance is documented for all equipment received and installed on site, an Equipment In Storage Maintenance Sheet and Maintenance Log is prepared for each equipment item that requires in-storage maintenance. In addition, site Quality Assurance is performing surveillance of this program.

Date When Full Compliance Was Achieved:

Full compliance was achieved on October 5, 1983 with the approval of Rev. 1 of MMM-14.