



CP&L
A10 : Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
March 16, 1984

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

NRC-193

Dear Mr. O'Reilly:

In reference to your letter of February 15, 1984, referring to RII: GFM/RLP 50-400/83-37-01, 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 and planned 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

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 and drawings.

Contrary to the above, CP&L failed to require that Class IE cables be adequately supported in accordance with documented procedural requirements and that only approved materials be used for supporting cables in Class IE electrical cabinets. On January 13, 1984, an electrical craft worker was observed using unapproved material to install electrical cable supports inside the secondary shutdown board.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

Engineering and Construction were aware of the need to support cables within panels. A judgment was made by Construction, based on discussions with Engineering, to provide temporary support to prevent cables from getting damaged, pending development of approved criteria.

Corrective Steps Taken and Results Achieved:

HPES is currently performing a review of all safety panels to determine what cable support is required. Review of the PIC cabinets has resulted in FCR-AS-4564 being written to provide details for additional cable support.

Ty-Rap bases that have been installed have been approved by FCR-E-1972 for temporarily supporting cable until such time as permanent cable supports are installed. HPES is currently evaluating the effects of leaving these bases in the panels.

HPES review, issuance of design criteria and implementation of the necessary procedures to control past and future work will be completed by September 1, 1984.

Corrective Steps Taken to Avoid Further Noncompliance:

As discussed in FCR-E-1972, no additional Ty-Rap bases are to be installed without HPES approval. The craft electrical terminators have been made aware of this requirement.

If there is a need to temporarily support cable until a permanent method is available, HPES will be contacted for approval of the temporary support.

A Procedure Change Notice (PCN) to Work Procedure WP-210 has been approved to require that cables be supported in accordance with approved methods.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by September 1, 1984.