



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
March 9, 1984

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

NRC-184

Dear Mr. O'Reilly:

In reference to your letter of February 15, 1984, referring to RII: GFM/RLP 50-400/83-37-02, 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)

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PDR ADQCK 05000400
Q PDR

Attachment to CP&L Letter of Response to NRC Report RII: GFM/RLP 50-400/83-37-02

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 1.6.5.5 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 that QA operational surveillance records be reviewed and filed in accordance with procedural requirements. On January 9, 1984, a review of these records showed that four of the 37 QA surveillance for operations had not been reviewed by the Operations QA/QC Supervisor and forwarded to the QA vault for safekeeping. This is a repeat violation.

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

Denial or Admission and Reason for the Violation:

The violation is admitted, but with the following clarification: Under our program, site-generated documents are not considered "QA Records" until final review and transmittal to the QA Records custodian has occurred. As indicated in the NRC Report, we failed to meet the intent of our procedure in that the documents in question had not been reviewed and filed in a timely manner. We contend that this is not a repeat violation in that the condition is not similar to the Violations, C & D, contained in Notices of Violation sent to us September 1, 1983 and October 19, 1983, respectively.

The four operational QA surveillance records in question were not reviewed and issued due to an administrative oversight.

Corrective Steps Taken and Results Achieved:

The four reports in question were temporarily stored in a one-hour rated fireproof file cabinet. These four reports were reviewed, issued, and copies forwarded to the QA Records vault for storage on January 16, 1984.

Corrective Steps Taken to Avoid Further Noncompliance:

The surveillance report log has been changed to include a "Submitted Date" column. This will provide more administrative control in expediting issuance of the reports. Copies of surveillance reports are now being sent to the vault as a routine part of distribution when the reports are issued.

Date When Full Compliance Was Achieved:

Full compliance was achieved on January 16, 1984.