



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
June 1, 1984

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

NRC-222

Dear Mr. O'Reilly:

In reply to your letter of April 6, 1984, referring to RII: GFM/RLP 50-400/84-10, we sent our response (NRC-213) to the violation identified in Appendix A to you on May 3, 1984. In order to more clearly address the concerns of the inspectors, the attached is Carolina Power and Light's revised reply to the referenced violation.

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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Attachment to CP&L's Revised Letter of Response to NRC Report RII: GFM/RLP 50-400/84-10

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 insure that the current craft certifications records for electrical terminators and painters be filed in the QA vault. This item was identified by the resident inspectors on March 16, 1984.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated, with the following clarification:

One purpose of procedure CQA-4, QA Records, is to ensure identification and proper maintenance of Qualification/Certification records for inspection personnel and personnel performing special processes as delineated in ANSI N45.2, Section 10.

Procedure WP-210, Installation and Termination of Wire and Cable, requires that the terminators be qualified. While not a regulatory requirement, this measure was taken to provide additional assurance that terminations are properly made. Although the procedure does not require that the terminators' certification records be filed in QA records, investigation showed that some of these records had been transmitted to QA records and that the QA records index (QAI-4.1) provided a filing location for these records. This condition was caused by a lack of clarity in the intent of procedure WP-210 and is not considered a violation.

It is acknowledged that there was a lapse in the certification of one terminator in which a safety-related termination was performed during the lapse. The terminator was scheduled to attend a recertification, but was absent on the scheduled day. The terminator's foreman failed to reschedule this individual, therefore causing his certification to lapse.

Painters' certification records are not transmitted directly to the QA vault. The document is first reviewed by QA for accuracy and completeness. The review process may take several days. Therefore, the date on the certification transmittal may be several days ahead of the date the records are placed in the QA vault. This was the case when the transmittal sheets indicated that the missing records had been transmitted to QA and the records were not in the vault. They were, in fact, still in the QA review process.

The certification records of the one painter mentioned had not been transmitted to QA for review and retention as per procedure WP-44, Painter Certification, due to a temporary change in personnel handling painters' certification records. This was found to be an isolated case.

Corrective Steps Taken and Results Achieved:

The terminator has been recertified. The terminations he performed prior to the lapse in certification, during the lapse and after the recertification, have been inspected by certified CI inspectors and were found acceptable.

The certification records of the one mentioned painter have now been transmitted to the QA vault. All painters' certification records have been checked and updated as necessary.

Corrective Steps Taken to Avoid Further Noncompliance:

Positive administrative measures have been taken by the discipline electrical engineer to track the recertification due dates of the safety-related terminators. In addition, the requirement of maintaining valid certifications for all terminators performing safety-related terminations has been reemphasized to the craft superintendents.

A Procedure Change Notice to WP-210 was issued to clarify that the terminators' qualification and requalification records would be maintained by the Discipline Electrical Engineer.

Procedure CQA-4, was revised to indicate that personnel qualification/certification records were required QA records only when so designated in other site procedures or instructions.

Terminators' qualification records were removed from the QA records storage facility and returned to the Discipline Electrical Engineer for retention. The QA records filing index (QAI-4.1) was revised to delete the file location for cable terminators.

All individuals responsible for painters' certification records have been retrained as to the requirements of procedure WP-44. The paint superintendent and clerks have been trained to ensure that the certification records are transmitted to QA for review and subsequent retention. An alternate clerk has been trained in case a change of personnel takes place. WP-44, Exhibit 1 (Painter Certification Record), has been revised to include social security numbers to aid in positive identification.

Date When Full Compliance Was Achieved:

Full compliance was achieved on May 25, 1984.