



Carolina Power & Light Company

34 SEP 11 A 8:46

P. O. Box 101, New Hill, NC 27562
September 7, 1984

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, GA 30323

NRC-263

Dear Mr. O'Reilly:

In reference to your letter of August 9, 1984, referring to RII:
GFM/RLP 50-400/84-23-02, 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/jed

Attachment

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

8410240191 840924
PDR ADOCK 05000400
Q PDR

Attachment to CP&L Letter of Response to NRC Report RII:
GFM/RLP 50-400/84-23-02

Reported Violation:

10 CFR 2.201 requires the licensee to submit to the NRC a written reply to a Notice of Violation. This reply shall include both corrective steps which will be taken to avoid further violations and the date when full compliance will be achieved.

Contrary to the above, your response to violation 400/84-10-01, dated June 1, 1984, stated that all painter certification records were reviewed and updated as necessary. A review of these certification records on June 29, 1984, demonstrated that all painter certification records had not been reviewed and updated.

This is a Severity Level IV violation (Supplement VII).

Denial or Admission and Reason for the Violation:

The violation is admitted with the following clarification:

The violation report correctly describes the condition of the painters certification records. The following discussion is offered inasmuch as there is a distinction between adequacy of records development (Violation 400/84-23-01) and absence of records in the QA vault (Violation 400/84-10-01).

The correction and preventive steps for violation 400/84-10-01 were taken with the understanding that the point of issue was that records known to exist were not in the QA vault. Consequently, the missing painter certification records were retransmitted to QA records (correction of missing record); and refinement of the records transmittal process, plus instructions of cognizant personnel, was made (prevention of further loss of records). The action of checking and updating the painter certification records (referred to in the response to Violation 400/84-10-01) was for the purpose of ensuring that the records in the discipline files were on file in the QA vault.

In summary, the actions taken and the response to violation 400/84-10-01 were based upon our understanding of the violation, its cause, and the needed corrections and preventive actions.

Corrective Steps Taken and Results Achieved:

The painters that are applying Service Level I coatings have undergone certification/re-certification to bring the records up-to-date and in compliance with procedure requirements. Copies of the records have been transmitted for filing in the QA vault.

Corrective Steps Taken to Avoid Further Noncompliance:

To ensure that painter certification records are in compliance with procedure requirements, the coatings discipline engineer now has the responsibility of reviewing and approving the certifications. Site procedure WP-44 (Painter Certification) has been revised to provide for this action.

Date When Full Compliance Was Achieved:

Full compliance was achieved on September 7, 1984.