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In the Matter of
Carolina Power & Light Company and North
Carolina Eastern Municipal Power Agency
(Shearon Harris Nuclear Power Plant)
Docket No. 50-4000L

Administrative Judges Kelley, Bright and Carpenter:

Applicants hereby notify the Board of a modification to the evidence presented in response to Eddleman Contention 41 (Pipe Hanger Welding). Hearings on Eddleman 41 have been held, and proposed findings of fact submitted by Applicants, Mr. Eddleman, and the NRC Staff. The change, described below, to the non-welding aspects of the Harris Plant pipe hanger

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installation/inspection program, is not material to Applicants' case and should not affect the Board's decision on the contention.

Eddleman 41, as limited by the Board, challenged the adequacy of pipe hanger welding inspections at the Harris Plant. Welding inspections of pipe hangers at the Harris site are performed by the QC (Quality Control) organization. Pipe hangers are also subjected to inspections of non-welding attributes for design compliance, such as location, geometry and material, which are performed by the CP&L CI (Construction Inspection) organization. Nevill et al., ff. Tr. 6663, at 8, 13-14. Consideration of these CI inspections was deemed outside the scope of Contention 41, which focused on hanger welding. See, e.g., Tr. 7263-68.

In their testimony, Applicants described an enhanced hanger installation/inspection program which was put into place in December, 1983, to provide more positive control of construction, inspection and documentation activities. Applicants' witnesses identified four key elements of the enhanced program, one of which was as follows:

(3) A field hanger engineering support unit has been developed whose purpose is to support the craft during hanger installation. These Hanger Engineering personnel remain in the field throughout the hanger's construction and identify and resolve installation problems. These efforts produce additional confidence that the design organization's intent is being met during construction. Field Hanger Engineering personnel also examine the hanger for design compliance and have Welding Engineering personnel examine hanger welds (both shop and field) prior to submitting the hanger package to CI and QC for final inspection. Hanger Field Mods are generated by Hanger Engineering personnel to resolve problems encountered. These examinations by the Hanger and Welding Engineering personnel will generate higher quality levels in the work being presented for final inspection and thereby render this process more effective.

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Nevill, et al., ff. Tr. 6663, at 24-25. See also id. at 11.

CP&L's experience with the enhanced program over the past 16 months has led to the conclusion that it is no longer necessary or warranted to have Hanger Engineering personnel examine the hanger for design compliance prior to submission of the hanger package to CI for final inspection. Consequently, CP&L has eliminated this specific activity from the hanger program. This verification step now will be performed by craft supervisors. (There is no change in the role of Welding Engineering personnel as described in the testimony. In particular, Welding Engineering personnel continue to review pipe hanger welds prior to the QC welding inspection.) Note that Hanger Engineering personnel, augmented now by Harris Plant Engineering Section personnel, will continue to be involved with the installation process in the field, generating pipe hanger field modifications and assisting the craft with problem solving, as described in the testimony.

This limited modification to the hanger program is not material and should not affect the Board's decision on Eddleman Contention 41. First, as noted above, the focus of the contention is on welding inspections by QC. In contrast, this revision applies only to the CI scope of inspection, which is non-welding attributes. Second, while the witnesses noted that the provision of engineering support to the craft was one facet in the improvement of the pipe hanger program, the parties have not relied on the design compliance verification by Hanger Engineering personnel as a major factor affecting program adequacy. See Tr. 7038 (Hate), 7358-59 (Blake). Applicants and Mr. Eddleman did not refer to this Hanger Engineering verification in proposed findings of fact. While the Staff repeated the testimony quoted above in its proposed findings which describe the enhanced program, the Staff did not refer to this verification step in its proposed finding which summarizes the bases for Staff confidence in the program. "NRC Staff Proposed Findings of Fact and Conclusions of Law on Joint Intervenor's Contentions I, IV and VII(4) and Eddleman Contentions 9, 41 and 116," January 22, 1985, at ¶¶ 516(3) and 521.

Respectfully submitted,

Thomas A. Baxter

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Counsel for Applicants

cc: Service List attached

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket Nos. 50-400 OL
and NORTH CAROLINA EASTERN)	
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant))	

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