



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DCS  
JUL 12 1985

Docket No. 50-400

Carolina Power and Light Company  
ATTN: Mr. E. E. Utley  
Executive Vice President  
Power Supply and Engineering  
and Construction  
P.O. Box 1551  
Raleigh, NC 27602

Gentlemen:

SUBJECT: INTEGRATED DESIGN INSPECTION 50-400/84-48

This refers to your letter dated June 13, 1985 which was in response to our letter forwarding the subject inspection report dated April 15, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. Certain of the items of your response require additional information, review, and/or reinspection to assess their acceptability. In other areas the NRC inspection team disagrees with statements made concerning the validity of inspection findings. However, these matters are not pursued since you have indicated that appropriate corrective action is being taken.

A close-out inspection by members of the team is planned to examine areas requiring further information. The enclosure to this letter describes areas that will be inspected by the team. However, the team will not necessarily be limited to the items in the enclosure, but may also inspect other items discussed in your response to the Integrated Design Inspection (IDI) report. Although our report did not require you to respond to observations, we note that your response did address these items. During our review of your response to these items, several questions were identified by the team which will also be examined during the reinspection.

Please have the information described in the enclosure to this letter available for the close-out inspection currently scheduled for July 22-24, 1985.

Sincerely,

Brian K. Grimes, Director  
Division of Quality Assurance, Vendor  
and Technical Training Center Program  
Office of Inspection and Enforcement

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Q PDR

Enclosure:  
Shearon Harris IDI Items Requiring  
Reinspection and/or Additional  
Information

Mr. E. E. Utley

- 2 -

Distribution:

DCS016

QAVT Reading

QAB Reading

RHVollmer, IE

BKGrimes, IE

GTAnkrum, IE

JLMilhoan, IE

ELJordan, IE

PFrederickseon, RII

RAchitzel, IE

BBuckley, NRR

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cc w/enclosures

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## MECHANICAL SYSTEMS

### D2.2-1 (Deficiency) Missing Drawings from Westinghouse Design Interface Drawing List (DIDL)

The team will review the latest transmittal of Design Interface Drawings from EBASCO to Westinghouse and the response from Westinghouse indicating no significant impact on design.

### D2.2-2 (Deficiency) Errors in Westinghouse Proof of Design Calculations

The team will review the revised calculation CWS-CQL-025 to ascertain if the licensee's preliminary conclusion was correct.

### D2.3-1 (Deficiency) Containment Recirculation Sump Design

The team does not agree with the licensee's conclusions for this item, therefore this item is being referred to NRR as a licensing issue.

### D2.3-3 (Deficiency) Refueling Water Storage Tank Vortexing

The team will reinspect calculations EQS-2 and TANK 13 in order to resolve the apparent differences between the original finding and the licensee's response.

### D2.3-5 (Deficiency) Containment Spray System Eductor Flow Rate

The team will review the revised calculation CT-27. The team will also review the effect of these revised eductor flow rates in the sump pH calculation.

### U2.4-1 (Unresolved Item) Cable Tray Combustible Load Calculation

The team will review the revision to calculation 46-A0.

### D2.4-2 (Deficiency) Cable Tray Overfill

The team will review the combustible loading calculations following their revision to reflect the as-built condition.

### D2.4-3 (Deficiency) Combustible Load Within Fire Area 1-A-BAL

The team will review the revisions to calculation FP-S-1-A-BAL and the associated FSAR change request.

D2.4-4 (Deficiency) Use of Minitrim (PVC) in Areas Outside Containment

The team agrees with the need to revise the applicable Engineering Section Instructions 3.1 and 3.2 to ensure the Field Change Requests are reviewed for impact on the Fire Hazard Analysis. The team will review these changes. The team plans to review the analysis of the impact of the current use of Minitrim.

D2.6-1 (Deficiency) Installation of Charging Pump Room Air Handling Units

Further clarification of the action to be taken to resolve the inconsistencies identified in the finding is needed. The team is concerned about other Equipment Installation Packages that are not in compliance with Work Procedure WP-105 with respect to torquing of anchor bolts.

D2.7-1 (Deficiency) Non-Seismic Piping Interaction Damage Study

The team needs clarification of action to be taken to resolve the unchecked calculation issue and subsequent use of the results. The team will review and evaluate the procedures developed for Seismic II/I walkdown. The results of the two Phases of the Seismic II/I walkdown will be reviewed by the NRC.

D2.7-2 (Deficiency) Non-Seismic Piping Interaction Damage Study

The team is unclear regarding the action taken to resolve the Seismic II/I condition identified in the finding. The team will review and evaluate the procedures developed for the Seismic II/I walkdown. The results of walkdown will be reviewed by the NRC.

D2.8-1 (Deficiency) Field Installation Tolerances for Hangers

The team needs clarification regarding what action is being taken to correct the specific problem identified in the finding. The team will review and evaluate the procedures developed for the walkdown. The results of the walkdown will be reviewed by the NRC.

D2.9-1 (Deficiency) Pump Vendor Drawing Error

The team will review the corrected vendor drawing and the revised pump instruction manual.

D2.5-1, D2.5-3, D2.5-4, D2.5-5, D2.5-6, and D2.5-7

The team has not yet reviewed and evaluated the response to these deficiencies. They will be evaluated during the reinspection.

## MECHANICAL COMPONENTS

### D3.1-4 (Deficiency) Harris Project Pipe Support Procedures

Carolina Power and Light has merged two separate pipe support design guidelines that contained inconsistent deflection criteria into a single document. That document stipulates deflection criteria that are consistent with a pending amendment to FSAR table 3.9.3-7. The team will review these changes.

### D3.1-5 (Deficiency) Supplementary Steel

The Carolina Power and Light Harris Plant Engineering Section design guidelines specified supplementary steel tabular data developed by Bergen-Paterson for seismic as well as non-seismic applications. However, Bergen-Paterson had limited the use of that tabular data to non-seismic supports. Carolina Power and Light has obtained confirmation of the seismic qualification of that tabular data from Bergen-Paterson for incorporation into the Harris Plant Engineering Section design guidelines. The team will review this documentation.

### D3.1-6 (Deficiency) Pipe Support Stress Check

Carolina Power and Light has corrected the design guidelines and is reviewing final calculations which were done while the erroneous equation was in effect. The team will review these actions and efforts.

### U3.1-7 (Unresolved Item) U-Bolt Load Interaction

The team will review Bergen-Paterson confirmation that use of the linear interaction equation was appropriate, and that qualification of these U-bolts was by linear analysis.

### U3.1-8 (Unresolved Item) Friction Anchor Clamps

This unresolved item concerned the evaluation of stress in small-bore pipe restrained with friction anchor clamps. The team plans review of:

- a) the Bergen-Paterson analysis for friction anchor clamps which limits local pipe wall stresses to 12,000 psi;
- b) the work procedures for installation and inspection of friction anchor clamps; and
- c) computer analysis stress ratios as a function of allowable stress at friction anchor clamp node points.

### D3.2-1 (Deficiency) DBE Inertia/Functional Capability

The licensee stated that a sample study of ten calculations was performed in order to confirm the reasonableness of the assumption that if the OBE load case meets its stress limits, in turn so will the DBE load case. While in most cases this is true, the team plans to review a larger sample in order to assess functional capability.



### 03.2-3 (Observation) Evaluation of Valve Accelerations

The response states that a program initiated in 1982 requires that, for all new or revised calculations, an appropriate valve evaluation sheet be prepared and included in the calculation package. The team is still of the opinion that for all previously released calculations where g-loading had not been performed, as is the case of this observation, evaluations should be conducted and documented in the stress package. Further inspection of this matter is planned.

### D3.2-4 (Deficiency) Westinghouse Active Valve Qualification Program

The licensee response stated that previously omitted valve evaluation sheets are now part of the calculation package 141-2. Additional inspection is necessary in order to confirm:

- (1) that for the three active valves 2CS-V600-SB-1, 2CS-V601, and 2CS-V602-SB-1, g-loading and end loading evaluation meet appropriate limits and are properly documented;
- (2) that for active valves 2CS-V601-SB-1 and 2CS-V602-SB-1, the sketch included on the valve acceleration calculation sheets is consistent with the mathematical model and vendor valve drawings; and,
- (3) that the procedure outlined by the response is technically acceptable, consistent with the procedure used on a majority of previously calculated valve g-loading evaluations, and if it follows the same logic as used by the EBASCO in-house pipe program in calculating valve g-loading.

### D3.2-6 (Deficiency) Emergency Condition Stress Ratio

The licensee response stated that several changes were incorporated into the reanalysis resulting in the significant reduction of emergency condition stress levels. The team plans to inspect the revised calculation to evaluate the influence of the design changes for all loading conditions.

### D3.2-8 (Deficiency) Thermal Expansion Input

Calculation 141-1 was rerun and the licensee stated that there was no impact on the existing design. The team will review the revised calculation.

### D3.2-9 (Deficiency) Volume Control Tank Nozzle Displacement

The licensee stated that calculation 142-3 was rerun with the previously omitted nozzle displacement and the existing design has been demonstrated to be adequate. The team will inspect the revised calculation to evaluate the influence of the corrected 250F thermal mode on the existing design.

### D3.2-17 (Deficiency) Regenerating Heat Exchanger Seismic Analysis

The team will review documentation of EBASCO's plans to model the vertical restraint adjacent to the tube side inlet nozzle of the regenerative heat

exchanger as a snubber and rerun calculation 3006 with the revised modeling upon its next revision.

#### U3.3-1 (Unresolved Item) ITT Grinnell Air Operated Valves

EBASCO and Westinghouse have developed a modeling procedure to address the analysis of ITT Grinnell diaphragm-operated valves originally procured as rigid and determined to be flexible. The team will review the procedure for analysis of the valves and plans for implementation of the procedure.

#### D3.4-1 (Deficiency) Pipe Support Strut Design

The response to this deficiency does not acknowledge that the dynamic stresses and deflections of slender struts subjected to a seismic event can be significant, and states that such an evaluation was not performed for the struts installed in the plant. However, the team will review and evaluate licensee actions taken to address this concern.

#### D3.4-2 (Deficiency) B-P/CP&L Pipe Support Design

The team will review revised pipe support calculation A-6-236-1-CS-H-2027.

#### U3.5-1 (Unresolved Item) Westinghouse Supplied Non-Active Valves

EBASCO has obtained formal concurrence from Westinghouse that end loads for Westinghouse-procured non-active valves need not be considered. The team plans to review this documentation.

### CIVIL/STRUCTURAL

#### D4.2-4 (Deficiency) Preparation of Calculation

Inspection of the remedial work which has been performed to address this deficiency is planned.

#### D4.2-7 (Deficiency) Shear Area

The licensee indicated that some reanalyses were performed. The team had reviewed part of the reanalyses during the initial inspection and found that they were acceptable. The team will review the remainder of the reanalyses during the reinspection.

#### D4.4-1 (Deficiency) Loading Combinations

Calculation books CAS -1 and 2168-G-253-S02 will be examined during the reinspection to verify that the licensee's evaluation is properly documented.



#### D4.5-1 (Deficiency) Slab Design Using Direct Design Method

EBASCO states that they have performed confirmatory calculations for the Reactor Auxiliary Building and Fuel Handling Building slab panels to show that the existing design is adequate. These calculations will be inspected to determine their acceptability.

#### D4.5-3 (Deficiency) Load Combination for Slab Design

The team will inspect the latest load combination calculations used for slab design.

#### D4.5-4 (Deficiency) Seismic Analysis for Masonry Walls

EBASCO has performed analysis to demonstrate that these walls are adequate. This analysis will be inspected to determine its acceptability.

#### D4.5-5 (Deficiency) Use of Floor Spectra

EBASCO has performed analysis using the broadened response spectra. An inspection of this analysis is planned.

#### D4.5-6 (Deficiency) Design of Masonry Wall Around Stairway A-4

The team considers the response to be inadequate. The response states that although the design changes were reviewed, the original calculation was not revised. Specifically, the team believes that EBASCO should perform an analysis of the final configuration of the wall to determine its structural adequacy. This analysis should include a frequency analysis of the wall to determine the seismic loads. The team will inspect the frequency analysis for the block wall, if such an analysis has been performed.

#### D4.8-1 (Deficiency) Load Combinations for Main Dam Spillway

EBASCO performed additional analyses of the main dam spillway to show that the existing design is adequate. The team will inspect the analysis of the main dam spillway to verify that the existing design is adequate.

#### D4.8-2 (Deficiency) Main Dam Spillway Abutment Design

EBASCO has performed reanalysis of the abutment wall using the correct weight to show that the existing design is adequate. This reanalysis will be inspected.

#### D4.9-1 (Deficiency) Boron Recycle Hold-up Tank Seismic Loads

EBASCO has performed analyses of slabs supporting large tanks in the Fuel Handling Building, Reactor Auxiliary Building and the Waste Processing Building. The response states that these analyses show that the existing designs are adequate. These calculations will be inspected to assess their adequacy.

#### D4.10-1 (Deficiency) Cable Tray Support Frequency

The team will inspect both the calculation for all supports shown on sample drawings and the frequency analysis for longitudinal bracing.

#### D4.11-1 (Deficiency) Frequency of HVAC Ducts

EBASCO has identified five cases for which they are in the process of confirming the support and duct adequacy. These calculations will be reviewed by the team.

#### D4.11-2 (Deficiency) Loads on HVAC Duct Supports

EBASCO has identified various cases where actual loads are higher than those used in the support design. They are still performing confirmatory analyses on these supports to establish their design adequacy. These calculations will be inspected.

#### D4.11-3 (Deficiency) Frequency of HVAC Duct Supports

EBASCO has initiated a program to evaluate the calculations for all supports shown on sample drawings. This evaluation will be inspected to determine whether the supports have frequencies above 16 Hz.

### ELECTRICAL POWER SYSTEMS

#### U5.2-1 (Unresolved Item) Electrical Power Design Procedures & Guidelines

The team is concerned that the guidelines which are still in preparation apparently have not been issued to the working unit. The team will review the completed Harris Plant Engineering Section electrical unit's Design Procedures and Guidelines. Please provide a status of the 13 proposed guidelines.

#### U5.3-1 (Unresolved Item) Independence of Electric Systems

The team will review the design change notices and the revised drawings associated with this modification.

#### D5.4-1 (Deficiency) Protection of Safety-Related Buses

The team will review the SLAP computer program and the associated procedure for controlling loads connected to the affected buses. Additionally, the team will review the Harris Plant Engineering Section procedure for analyzing bus loading.

#### D5.4-2 (Deficiency) Motor Operated Valve Thermal Overload Settings

The generation of a new procedure for selection of safety-related motor operated valve thermal overload settings is considered an acceptable solution

to the procedural error. However, it is still the intent of the licensee to have the start-up group select the overload heaters.

The team will review the newly developed Harris Plant Engineering Section design criteria relating to selection of overload heaters for intermittent duty motors. The team will also review the start-up organization implementing procedure.

#### D5.4-3 (Deficiency) Design Verification of Thermal Overload Settings

Revision of procedure 1/2-9000-E-01 to include an independent review of the heater selection and verification of those overload heaters previously selected is considered an acceptable solution. The new procedure (1/2-9000-E-06) for motor driven valve operators will be reviewed as part of the follow-up for deficiency D5.4-2.

#### D5.4-4 (Deficiency) Station Service Transformer Protective Relaying

The team will review the revised relay settings and implementation of the load control program.

#### U5.4-5 (Unresolved Item) Procurement of Quality Components

The response to this item does not contain sufficient information to evaluate the adequacy of the verification process to be used to certify terminal boxes purchased without a certificate of compliance. Additionally, no response was provided concerning the substitution of "equivalent" terminal boxes. The team requests that information be provided regarding how equivalence was determined.

#### D5.5-1 (Deficiency) Battery Sizing Calculations

The team will review calculations 56-JRG and 57-JRG which have superseded calculation 52-AMM. In so doing the team will confirm the revised inputs used in the calculation and verify that the first minute discharge is now the critical period for sizing the Shearon Harris batteries.

#### D5.5-2 (Deficiency) DC Equipment Rated Maximum Voltage

This deficiency identified the fact that the licensee had not confirmed the qualified operating voltage range for dc equipment. In the response, the licensee stated 3 possibilities that they would pursue to determine the rated maximum voltage for the safety-related dc equipment. The response stated that the primary method you planned to be used to verify the capability of the dc equipment to operate at maximum voltage will be a comparison of vendor data with the requirements of the specification. The team is concerned that many of the specifications for the equipment in question did not specify the maximum dc voltage range.

The team also questions how the second and third alternative will address the over voltage concerns.

The team will review implementation of the resolution to this deficiency, particularly the details of alternatives 2 and 3.

#### D5.5-3 (Deficiency) Battery Discharge Voltage Profile

The team will review calculation No. 20-WRE, which has superseded calculation No. 43-SKD, to evaluate the revised voltage profile.

#### D5.5-4 (Deficiency) DC System Minimum Voltage

The team will review calculation No. 20-WRE, which has also superseded calculation No. 44-SKD, to evaluate the base voltages used in the close and trip circuit voltage drop calculations and the resulting circuit restrictions on cable size and length.

#### D5.6-1 (Deficiency) Penetration Protection Qualification

The team will review the revised control wiring diagrams associated with this change to confirm the independence between the primary and backup protection for these penetrations.

#### D5.7-1 (Deficiency) Use of Motor Data in Setting Procedure

The team is concerned that the work has proceeded with the Harris Plant Engineering Section guideline for relay protection not being completed. The team will review the revised relay setting calculations and coordination curves as well as Harris Plant Engineering Section guideline No. 7.5.G for relay protection. The team will examine how these calculations and curves will be verified and when the guideline will be completed.

#### D5.7-2 (Deficiency) 480 V Bus Undervoltage Alarm

The team will review the revised relay setting drawings, the supporting voltage study and relay setting calculations. The team will also review your justification for setting the bus undervoltage relays below the minimum rated motor voltage.

#### D5.8-1 (Deficiency) DC Motor Operated Valve Voltage Drop

The team will review your cable sizing criteria for dc motor operated valves and the resulting voltage drop calculations or analysis supporting the selection of the revised cable sizes.

#### D5.9-1 (Deficiency) Reactor Vessel Level Instrumentation System RCP Input

The team will review the revised control wiring diagram CAR-2166-B-401 sheet 140 and Design Change Notice 251-257 to confirm the degree of independence added between the RCP status inputs to each RVLIS train.

#### D5.10-1 (Deficiency) Site Engineering Design Change Control

The team will review the calculation prepared for sizing the new cables for the auxiliary transfer panels, and the new design guideline for control and verification of cable and circuit breaker sizing.

### INSTRUMENTATION AND CONTROL

#### D6.1-2 (Deficiency) FSAR/Instrument Index Consistency

The team identified a number of differences between statements in the FSAR and data provided in the EBASCO Instrument Index. With regard to the specific items noted by the team, this deficiency is considered to be closed; however, the team will examine the recently revised EBASCO E-65-SH procedure mentioned in the response with respect to applicable standards and codes used for equipment procurement.

#### D6.1-6 (Observation) CVCS Design Basis

During the review of an EBASCO Design Basis Document for the chemical and volume control system, the team observed a classification difference for the Chiller Surge Tank level transmitter between design documents and the Design Basis Documents which exist for this system. The response stated that the particular document reviewed by the team was not the appropriate one for this transmitter. The team will review Design Basis Document DBD-108 for the boron thermal regenerative portion of the chemical and volume control system.

#### D6.1-9 (Deficiency) EBASCO Procurement Specification

Numerous differences were noted by the team in the specification of industry standards and codes between EBASCO instrumentation procurement specifications and the EBASCO E-65-SH procedure used as an input document for procurement specification preparation, review, and approval. EBASCO has indicated technical differences of opinion with the team on which standards are required, and has stated that some procurement specifications reflected over-conservative cross-referencing. The team agrees with each of these EBASCO comments, particularly since EBASCO has not attempted to impose system level considerations on some vendors. In the interim, EBASCO has revised procedure E-65-SH to reflect those codes, standards, and NRC Regulatory Guides listed as requirements in the instrumentation specifications. The team plans to review this revised procedure.

#### D6.1-10 (Deficiency) Incomplete and Unissued Drafting Manual

At the Shearon Harris site, the team noted that issued instrumentation and control drawings were being modified without a Drafting Manual for the



instrumentation and control discipline as required by ANSI N45.2.11-1974. Carolina Power and Light has indicated that the manual has been prepared and issued, and that an internal Quality Assurance audit indicated that only minor changes were required to correct those drawing discrepancies noted. The team will inspect review of the Drafting guide and the QA audit report.

#### D6.3-2 (Deficiency) Conduit Separation

During the inspection of main control room panels at the plant, the team noted numerous instances of redundant flexible conduits that were in direct contact with one another. IEEE Std. 384-1974 requires that, where cables are enclosed within conduit panels, a one inch air gap separation distance be maintained between the redundant conduits unless lesser distances are supported by an analysis of the particular installation. At the time of the inspection, Westinghouse had not performed such an analysis for their panels, and EBASCO had permitted their panel vendor to follow the Westinghouse practice without requiring an analysis by the vendor.

EBASCO has performed a separate engineering analysis on the basis of wire size, control circuit fusing, voltage level separation, and control wiring insulation characteristics. This separation analysis will be reviewed by the team.

#### U6.3-3 (Unresolved Item) Instrument Impulse Line Separation Distance

The team believes that the Carolina Power and Light construction criteria for instrument impulse lines may be technically acceptable; however, further discussion and inspection are warranted regarding the basis for selection of a minor change designation for this change. Review of the justification analysis for FCR-I-1029, and review of a number of specific instrument tubing reroute changes is planned.

#### D6.4-2 (Deficiency) Vendor Conformance to Specification

The team will review the complete analysis provided by the remote sample dilution panel vendor to determine the acceptability of the installed hardware for worst case environments.

#### U6.5-1 (Unresolved Item) Design Basis for Safety-Related Instrument Setpoints

The team remains concerned that design basis documentation will not be provided for all safety-related balance-of-plant setpoints. During the reinspection the team plans: (1) further discussions with Carolina Power and Light regarding these balance-of-plant setpoints; (2) review of EBASCO setpoint calculations for HVAC and other temperature measurements; (3) review of EBASCO setpoint calculation EQS-19 for Emergency Service Water; (4) further discussion with EBASCO regarding the RAB sump pump setpoint documentation; (5) review of the Carolina Power and Light calculation for the Spent Fuel Pool; and (6) review of the new Carolina Power and Light Harris Plant Engineering Section Instruction 3.8.



D6.7-1 (Deficiency) Westinghouse Reactor Coolant Pump Instrumentation

The team noted that variations in instrument ranges existed for bypass flow switches for the reactor coolant pumps. The response stated that Westinghouse documentation has been revised, and that EBASCO documentation will be updated. This deficiency will be followed-up by the team's review of the Westinghouse specification sheet and the EBASCO Instrument Index.

D6.8-5 (Deficiency) Battery Room Service Sink

This item will be followed-up with the team's review of the change documents for this particular material change.

D6.8-6 (Deficiency) Calculation Basis for Licensing Amendment

This deficiency will be followed-up with the team's review of this Carolina Power and Light calculation and the revised Harris Plant Engineering Section instruction.

Items Common to More Than One Discipline

The licensee's response to the findings which were common to more than one discipline (IDI report section 7) have not yet been reviewed by the team. The response to these items will be evaluated during the reinspection.