



## DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*R. B. Starkey, Jr., General Manager
- \*D. H. Baur, Senior QA Specialist
- \*J. F. Benjamin, Operations Engineer
- \*C. A. Bethea, Training Supervisor
- \*R. H. Connally, Director, Nuclear Safety and QA
- \*C. W. Crawford, Manager, Operations and Maintenance
- \*H. S. Zimmerman, Manager, Technical and Administrative

#### Other Organizations

R. Muth, Westinghouse Engineer

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on January 9, 1981 with those persons indicated in Paragraph 1 above. The licensee acknowledged the inspection findings. The General Manager commented that with respect to the deviation discussed in paragraph 5.c., it had been CP&L's intent to keep the system operable to the degree required by CP&L's proposed yet unapproved Technical Specifications. The General Manager acknowledged that application of this philosophy did not assure compliance with the commitments upon which this deviation was based.

### 3. Licensee Action on Previous Inspection Findings

(Closed) Deficiency (50-261/80-21-04): Failure of operator requalification program to assure operator cognizance of procedural and design changes. A review of outstanding required reading in the control room indicated the licensee was currently in compliance with this aspect of continuous operator requalification. Therefore, the item of noncompliance is closed. However, the licensee's commitment to review a monthly status report of all reactor operator license retraining commitments was not being met. Until the licensee includes the retraining requirements of 10 CFR 55, Appendix A, Section 3.c in the monthly status report, the October 7, 1980 commitment in response to item 50-261/80-21-04 is not met and this item is open (50-261/81-02-01).

### 4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. A new unresolved item identified during this inspection is discussed in paragraph 5.d.

## 5. Plant Tour

The inspector observed control room operations including a review of the status of equipment associated with actuated annunciator lights and the status of equipment for which work authorized had been initiated. Findings were acceptable except as follows:

- a. Containment Pressure indicator PI-951 was identified as reading too low by Work Authorization OP-5 on January 2, 1981. The instrument is fed from the engineered safeguards circuitry utilized for containment isolation. Therefore, nonconservative performance of this element of the containment isolation circuitry was a possibility, yet the channel was allowed to remain in service. Around January 4, 1981 Work Authorization OP-114 was written indicating that PI-951 was indicating 3.75 psi low based upon +0.75 psid actual containment to atmosphere differential and -3.0 psid on PI-951. The channel remained in service until NRC inspection on January 7, 1981. These examples of failure to control nonconforming items constitutes a violation (50-261/81-02-02).

During the course of the inspection the licensee completed immediate corrective actions of investigating the problem. The condition was isolated to the nonprotective function of the indication meter, therefore the possibility of nonconservative safety circuit operation was not confirmed.

It was noted that log keeping practices were the measures established to keep operating personnel informed of the status of instrumentation declared out of service. However, no measures existed to indicate the operating status of instrumentation which was considered to be going out of tolerance indication yet was a reliable trend indicator or was in error by a known amount. The licensee should also address this aspect of control of nonconforming instrumentation in response to this item.

- b. The inspector noted inconsistent determination of safety classification of instrumentation on work authorizations initiated by Control Room personnel. Section 2 of ANSI N45.2-1971 requires the identification of items and services to which quality standards apply. Plant Operating Procedure, Appendix II is designated to provide this identification. However, safety related instrumentation was not identified, with the exception of Nuclear Instrumentation. Section II.4 .2 of the procedure gave only a guide for making the identification. This failure to identify instrumentation to which quality standards apply constitutes a violation (50-261/81-02-03).

It was also noted from Section 3.1.3 of ENG-2 that Electrical Components Controls and spare parts have apparently not been adequately identified. From discussion with licensee personnel the previously completed identification of mechanical components needs updating to

reflect revisions to plant design. The licensee should also address identification of safety related items other than instrumentation in response to this finding.

- c. The core subcooling monitor consists of two channels which were operational prior to the last refueling outage which ended in November 1980. Modifications to improve the qualifications of the equipment were initiated, however, not completed during the refueling outage. At the time of the inspection on January 7, 1981 both channels were administratively under control of the Instrumentation and Controls personnel. One channel was energized and providing indication of coolant saturation condition to the operators. However, this single channel was recognized to have multiple signal input problems. One of three pressure inputs was disabled. One of two hot leg temperature inputs was disabled (the third loop is only used in the deenergized channel). Seven of eight core exit thermocouples were disabled. The minimum Lessons Learned Short Term requirements included temperature indication from each hot leg or multiple core exit thermocouples. The CP&L commitment was in excess of these numbers of instruments. Since preplanned modification work reduced the capability of the system below the CP&L commitment and the minimum Lessons Learned requirement this is considered a deviation (50-261/81-02-04).

The licensee took immediate corrective action of restoring the deenergized channel to service from a temporary power supply and eventually its vital power supply during the course of this inspection.

- d. The Boron Injection Tank (BIT) low level alarm appears to be annunciating approximately three times a day. This is indicative of low level in a relatively low volume pot at the top of the BIT. The source of the gas filling this space and resulting in annunciation that the BIT is not full is not known. Positive means of removal of the gas is not provided. Operators pressurize the BIT to compress the gas and encourage its dissolution to clear the annunciation. These efforts to clear annunciations or to prevent them require excessive operator attention and equipment operation. Until the licensee evaluates the system design and operational problems associated with keeping the BIT full and indicating full and implements appropriate corrective action this item is unresolved (50-261/81-02-05).



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION II

101 MARIETTA ST., N.W., SUITE 3100  
ATLANTA, GEORGIA 30303

FEB - 9 1981

Carolina Power and Light Company  
ATTN: J. A. Jones  
Senior Executive Vice President and  
Chief Operating Officer  
411 Fayetteville Street  
Raleigh, NC 27602

Gentlemen:

Subject: Report Nos. 50-261/81-01 50-325/81-01, 50-324/81-01, 50-400/81-01,  
50-401/81-01, 50-402/81-01 and 50-403/81-01

This refers to the routine safety inspection conducted by V. L. Brownlee of this office on January 6-9, 1981, of activities authorized by NRC Operating License Nos. DPR-23, DPR-62, DPR-71 and Construction Permit Nos. CPPR-158, CPPR-159, CPPR-160 and CPPR-161 for the H. B. Robinson, Brunswick and Shearon Harris facilities and to the discussion of our findings held with Messrs. P. W. Howe and R. M. Parsons at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations or deviations were disclosed.

We have examined actions you have taken with regard to previously identified enforcement matters and unresolved items. The status of these items is discussed in the enclosed report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

C. E. Murphy, Chief  
Reactor Construction and Engineering  
Support Branch

Enclosure: (See Page 2)

FEB - 9 1981

Enclosure:

Inspection Report Nos. 50-261/81-01,  
50-325/81-01, 50-324/81-01, 50-400/81-01,  
50-401/81-01, 50-402/81-01 and 50-403/81-01

cc w/encl:

R. B. Starkey, Jr., Plant Manager  
A. C. Tollison, Jr., Plant Manager  
R. Parsons, Site Manager



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION II

101 MARIETTA ST., N.W., SUITE 3100

ATLANTA, GEORGIA 30303

FEB - 9 1981

Report Nos. 50-261/81-01, 50-325/81-01, 50-324/81-01, 50-400/81-01,  
50-401/81-01, 50-402/81-01, and 50-403/81-01

Licensee: Carolina Power & Light Company  
411 Fayetteville Street  
Raleigh, NC 27602

Facility Names: H. B. Robinson, Brunswick, and Harris

Docket Nos. 50-261, 50-324, 50-325, 50-400, 50-401, 50-402, and 50-403

License Nos. DPR-23, DPR-62, DPR-71, CPPR-158, CPPR-159, CPPR-160 and  
CPPR-161

Inspection at General Offices in Raleigh, NC and at Harris site near  
Raleigh, North Carolina

Inspector: Virgil L. Brownlee 2/9/81  
V. L. Brownlee Date Signed

Approved by: T. E. Conlon 2/9/81  
T. E. Conlon, Section Chief, RC&ES Branch Date Signed

SUMMARY

Inspection on January 6-9, 1981

Areas Inspected

This routine, unannounced inspection involved 25 inspector-hours on site in the areas of closeout of previously identified enforcement matters, unresolved items and inspection followup items.

Results

Of the three areas inspected, no items of noncompliance or deviations were identified.

## DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*P. W. Howe, Vice President, Technical Services Department
- \*R. M. Parsons, Site Manager, Harris
- \*N. J. Chiangi, Manager, Engineering and Construction QA
- W. J. Dorman, Project QA Specialist, Operations
- S. McManus, Corporate Nuclear Safety and QA Audit
- \*L. I. Loflin, Manager, Harris Plant Engineering Section
- \*A. M. Lucas, Senior Resident Engineer, Harris
- \*G. L. Forehand, Principal QA Specialist, Harris

Other licensee employees contacted included four office personnel.

#### NRC Resident Inspector

\*G. Maxwell

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on January 9, 1981 with those persons indicated in Paragraph 1. above.

### 3. Licensee Action on Previous Inspection Findings.

- a. (Closed) Infraction, 50-261/79-19-03, 10 CFR 21 - The violation was that CP&L had not developed and implemented appropriate procedures to assure that: deviations are evaluated per (21.21(a)(1)); the Director or responsible officer is informed per (21.21(a)(2)); the written report to the Commission contain the required information per (21.21(b)(3)); the required records are maintained per (21.51).

CP&L's letter of response and associated supplements dated November 2, 1979, November 21, 1979 and February 26, 1980 regarding this matter was reviewed by RII and found to be acceptable.

The inspector held discussions with responsible general office personnel and reviewed the following documents:

1. Corporate Procedure For Evaluating and Reporting of Defects and Noncompliances in Accordance With 10 CFR 21, Rev. 4, August 5, 1980.
2. Power Supply Group, Nuclear Operations Department Procedure No. No.-711, Evaluating and Reporting of Defects and Noncompliances in Accordance With 10 CFR 21, Rev. 1, April 1, 1980.

3. H. B. Robinson Administrative Instruction, Section 13 Instructions For Compliance to 10 CFR 21.
4. Nuclear Power Plant Engineering Department Procedure No. 3.11, Handling of Reportable Items Under 10 CFR 21, Rev. 1.

The inspector concludes that CP&L has implemented the corrective actions identified in their letter of response regarding the development and implementation of appropriate procedures to meet the posting, evaluating, informing, notifying, reporting and record keeping requirements of 10 CFR 21.

- b. (Closed) Infraction, 50-400/80-12-01; 50-401, 402, 403/80-10 -01, No Comprehensive System or Planned and Periodic Audits For Non-ASME Areas

CP&L's letter of response dated June 26, 1980 regarding this matter was reviewed by RII and found to be acceptable.

The inspector held discussions with responsible Corporate Nuclear Safety and QA Audit personnel, reviewed the Non-ASME Master Audit List, reviewed completed Audit Report QAA-160-8 and reviewed preparations for QAA/81-15 audit. The inspector concluded that CP&L has implemented the corrective actions identified in their letter of response dated June 26, 1980.

- c. (Closed) Infraction 50-400/80-12-02; 50-401, 402, 403/80-10-02; Failure to Properly Identify and Handle Audit Nonconformances.

CP&L's letter of response dated June 26, 1980 regarding this matter was reviewed by RII and found to be acceptable.

The inspector held discussions with responsible Corporate Nuclear Safety and QA Audit personnel and reviewed procedure QAAP-1, Rev. 10, May 14, 1980. The inspector concluded that CP&L has implemented the corrective actions identified in their letter of response dated June 26, 1980.

- d. (Closed) Unresolved Item 50-400/80-12-10; 50-401, 402 403/80-10-10, Licensee Identified Variences with ANSI N45.2.2

CP&L submitted on November 10, 1980 a letter to NRR QA Branch describing CP&L's activities at the Harris plant which are not in complete agreement with ANSI N45.2.2 as required by Section 1.8 of the SHNPP PSAR. Discussions with NRR QA Branch personnel indicate that the letter of clarification is acceptable.

The inspector reviewed the November 10, 1980 letter and concluded that it represents those activities which are being performed at present.

## 4. Unresolved Items

Unresolved items were not identified during this inspection.

## 5. Reporting of Defects and Noncompliances (10 CFR 21 and 10 CFR 50.55(e)) for Robinson (Part 21), Brunswick (Part 21) and Harris (Part 21 and 50.55(e))

## a. General

The purpose of this inspection was to ascertain whether CP&L, and appropriate responsible officers, has established and implemented procedures and other instructions as required to ensure compliance with 10 CFR 21 and 10 CFR 50.55(e) requirements relative to the reporting of defects and noncompliances. Inspector determinations are based on the requirements of 10 CFR 21 as clarified by staff positions in NUREG-0302, Revision 1 and additional IE guidance relative to 10 CFR 50.55(e).

## b. Documents Examined

1. Corporate Procedure for Evaluating and Reporting of Defects and Noncompliances in Accordance With 10 CFR 21, Rev. 4, August 5, 1980.
2. Power Supply Group Nuclear Operations Department Procedure No. 7.11, Evaluating and Reporting of Defects and Noncompliances in Accordance With 10 CFR 21, Rev. 3, April 1, 1980.
3. Administrative Procedure AI-39, BSEP Program for Compliance to 10 CFR 21, Rev. 3, June 16, 1980.
4. H. B. Robinson Administrative Instructions, Section 13 Instructions for Compliance to 10 CFR 21.
5. CP&L Technical Services Department Engineering and Construction QA Procedure AQAS-5, Reportable Items Under 10 CFR 50.55(e) and 10 CFR 21, Rev. 3, September 17, 1980.
6. CP&L Procedure for Evaluating Deficiencies in Accordance With 10 CFR 50.55(e), Rev. 9, September 9, 1980.
7. SHNPP Administrative Procedure No. AP-1X-16, Rev. 2, November 26, 1980, SHNPP Site Processing of Items in Accordance with 10 CFR 50.55(e) and 10 CFR 21.
8. Nuclear Power Plant Engineering Department Procedure No. 3.11 Handling of Reportable Items Under 10 CFR 21, Rev. 1.
9. Nuclear Power Plant Engineering Department Procedure No. 3.9, Handling of Reportable Items Under 10 CFR 50.55(e), Rev. 1.

c. Program Review

The inspector reviewed the above controlling procedures and verified that procedures have been established to assure that the following requirements of 10 CFR 21 will be met; the posting (21.6), evaluating deviations (21.21(1)), informing the director (21.21(a)), assure that the director will notify the Commission (21.21(b)), and to assure that procurement documents specify that provisions of 10 CFR Part 21 will apply when applicable (21.31), maintenance of records (21.51(a)), and disposition of records (21.51(b)). The inspector also verified that procedures have been established to assure that 10 CFR 50.55(e) identification, evaluation and reporting requirements will be met..

d. Program Implementation

The inspector held discussions with the above responsible managers, engineers, QA and QC personnel and examined the above noted areas for posting, audits and audit findings, nonconformances and evaluations, vendor and other sources of input, notification documentation, and reports to verify procedure implementation.

Based on the above program review and evaluation implementation the inspector concludes:

1. Responsible personnel at the site and General Offices are quite knowledgeable of Part 21 requirements.
2. Responsible personnel understand CP&L Part 21 procedures.
3. The procedures are adequate.

The inspector has no further questions regarding this matter.

6. (Closed) Inspector Followup Item 50-400/80-12-03; 50-401, 402, 403/80-10-03, Audit Frequency Inconrently Specified in QAAP-1

QAAP-1 procedure has been revised to meet the ANSI Standard requirement for annual audits of internal activities.

7. (Closed) Inspector Followup Item 50-400/80-12-04; 50-401, 402, 403/80-10-04; Modification of QA Monitoring Program Procedures

Site QA personnel have reviewed applicable site procedures and revised CQA-6, CQA-10, CQA-11, CQA-12 and CQA-13 to define responsibility for scheduling and documenting the monitoring of activities. The discipline QA specialist has been assigned the responsibility for scheduling the monitoring of the activities based on work in progress.

The inspector checked two area disciplines and found no discrepancies.

8. (Closed) Inspection Follow-up Item, 50-400/80-12-08; 50-401, 402, 403/80-10-08, Laydown Storage

CP&L is performing a monthly surveillance of the laydown storage area relative to proper identification and equipment status. The inspector performed an inspection of the laydown storage area and found no discrepancies.

9. (Closed) Inspector Followup Item 50-400/80-12-11; 50-401, 402, 403/80-10-11, QA/QC Site Organizational/Functional Alignment

CP&L submitted on September 19, 1980 a letter to NRR QA Branch describing the variances of CP&L's in place QA organization from that described in the PSAR. Discussions with NRR QA Branch personnel indicate that the letter of clarification is acceptable. The inspector reviewed the September 19, 1980 letter and concluded that it represents that organization which is presently in place.