

USNRC REC
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November 21, 1979
L-79-328

Mr. J. P. O'Reilly, Director, Region II
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:JL
Docket No. 50-389/79-18

Florida Power & Light Company has reviewed the subject inspection report and our response is attached. There is no proprietary information contained in the report.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MV/ah
Attachment

cc: T. E. Burdette
Harold F. Reis, Esquire

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ATTACHMENT

RII:JLJ
50-389/79-18

This NRC Inspection resulted in two findings as described below:

A. INFRACTION: Procurement - Failure to Follow Procedure:

Contrary to Florida Power and Light Procedure ASP-8, "Administrative Site Procedure, Procurement," prior to March, 1979, purchase requisitions for safety-related Service Level I protective coating materials for use on concrete inside containment were not prepared in accordance with the FPL QA Manual and were not submitted to FPL QA for review and approval. As a result, the material was not identified as safety related and was not inspected when it was received on site.

B. INFRACTION: Corrective Action - Failure to Follow Procedure:

Contrary to FPL Procedure SQP-21, "Corrective Action," an NCR was not initiated by FPL Quality Control after discrepant materials (Service Level I protective coating materials) were identified by the Region II inspector, and the discrepant materials were not placed in hold areas. As a result, application of the concrete protective coating materials continued in the Reactor Building after the materials had been identified as being discrepant.

RESPONSE: Florida Power and Light has evaluated the findings and submits the following responses:

A. Subsequent to the NRC inspection, a review of procurement records showed the following:

- 1) FPL blanket purchase order number 02372 - 24137 S - SL - 13713, dated December 14, 1978, originally was written as non-safety related for the subject material.
- 2) On February 13, 1979, purchase requisition number 116538 was written changing the subject material to safety related. This change was incorporated in Supplement #1 to this purchase order. This supplement changing the subject material to safety related, was reviewed and approved by QA.
- 3) The subject material was ordered on Delivery and Work Authorization Number 40611 and delivered to the site as safety related in accordance with Procedure SQP-11, "Site Quality Procedure, Procurement." Central Receiving placed the material in the paint storage facility and prepared Material Receiving Report (MRR) number 18849 in accordance with Procedure SQP-3, "Site Quality Procedure, Material Control." During the NRC inspection, this MRR could not be located in the field.

From the above review, it is clear that the material was purchased in accordance with current site procedures and was identified as safety related. During the NRC inspection on October 11, a supplementary MRR, number 18849A, was prepared and receipt inspection was performed by FPL Quality Control and the material was found to be acceptable. Our review and evaluation of this finding indicates that procurement of the protective coating material was accomplished in accordance with approved site procedure and that the material itself was not discrepant when inspected. Florida Power and Light therefore requests that this finding be reconsidered. Since this NRC inspection, Central Receiving now retains all protective coating materials identified as safety related in the warehouse until QC performs receipt inspection. This change was made to assure that misplaced forms can no longer impact receipt inspection. This change is currently in place and working.

- B. A Quality Control Receipt Inspection had not been performed when the material was received on site; however, immediately after identification of the discrepancy by the NRC Inspector, a Quality Control Receipt Inspection was initiated. Although the processing of the Receipt Inspection Report itself was not completed until October 12, 1979, the next day, Quality Control had determined on October 11, 1979, the same day, that the material itself was acceptable.

Since the material itself was not discrepant and the acceptability of the material had been determined by Quality Control, a Nonconformance Report was not issued and the material was not placed on hold.

SQP-3 (Material Control) does require that a tag or area marker, indicating that shipment is pending Quality Control inspection and material release, be attached. This was not done. Therefore, a deviation from our program did occur. Corrective action taken by Central Receiving, as described in the response to A. above, will also preclude further noncompliances of this nature.

