CP&L

Carolina Power & Light Company

January 2, 1979

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

In reference to your letter of December 12, 1978, referring to RII: RDB 50-400/78-08, 50-401/78-08, 50-402/78-08, and 50-403/78-08, the attached is Carolina Power & Light Company's reply to the deficiencies as identified. It is considered that the corrective and preventive actions taken are satisfactory for resolution of these items.

Thank you for your consideration in this matter.

Yours very truly,

P. W. Howe
Vice President
Technical Services

PES/gea
Attachment

cc: Mr. J. A. Jones

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A. Condition Reported

Section F(5) of the Construction Permit states, in part, that the applicant shall take the necessary mitigating action, including those summarized in Section 4.6 of the Revised Environmental Statement, during construction of the station, to avoid unnecessary adverse environmental impacts from construction activities.

Contrary to the above, inspection disclosed that, at least during the two week period prior to and including inspection, no mitigating action was implemented to control or otherwise minimize the unacceptable impact of road dust resulting from construction activities at the station power block.

Corrective Steps Taken and Results Achieved

1. Contractor was remobilized November 15, 1978, to assist in watering roads.

2. Reimplemented dust control measures November 15, 1978. Site roadways are watered as required to keep dust down. Watering is commenced when deemed necessary by either the Site Manager, Environmental Engineer, Construction Manager or General Superintendent.

Corrective Steps Taken to Avoid Further Noncompliance

1. Additional water truck has been ordered to improve the site's ability to control dust during dry periods.

Date When Full Compliance Was Achieved

November 15, 1978

B. Condition Reported

Section 4.6 (4.6.1.1.e) of the Revised Final Environmental Statement, as referenced in Section F(5) of the Construction Permit, requires, in part, that erosion and soil runoff causing contamination of surface waters will be minimized. It further requires, during early construction of the main dam, the use of smaller sediment traps, collection ditches, and intercepts to reduce the silt load to such waters.

Contrary to the above, inspection disclosed that the licensee failed to minimize contamination and silt loading of Buckhorn Creek at the main dam construction site.

Corrective Steps Taken and Results Achieved

Pursuant to North Carolina Administrative Code 15 NCAC 4B .0005a, an Erosion and Sedimentation Control Plan was submitted to the North Carolina Division of Land Resources on April 7, 1978 for the main dam. The Plan was approved by the Division of Land Resources subject to the condition that modifications could be required to improve the performance and effectiveness of the approved erosion control measures under actual field conditions. Accordingly, the following additional measures have been implemented:

1. Placed stone filter around standpipe of silt pond located south of the cofferdam.
2. Constructed additional, larger capacity, silt pond downstream of original silt pond south of the cofferdam.

3. Seeded slopes around the two south silt ponds.

4. Constructed additional silt pond northwest of the dam to catch runoff from adjacent spoil area.

5. Enlarged and installed riser pipe in silt pond north of the dam on the east side of Buckhorn Creek.

6. Seeded east bank of Buckhorn Creek at south end of dam.

7. Put in additional ditching along east side of Buckhorn Creek to channel runoff into the silt pond.

8. Put in ditching along west side of Buckhorn Creek north of the dam to direct runoff into the silt pond.

Corrective Steps Taken to Avoid Further Noncompliance

The senior CP&L representative at the Main Dam shall accompany the contractor's representative on comprehensive inspection tours of all sediment control devices at least monthly to ensure proper maintenance and construction of additional devices as necessary.

Date When Full Compliance Was Achieved

December 21, 1978

C. Conditions Reported

Criterion V of Appendix B to 10CFR50 as implemented by Carolina Power and Light PSAR Section 1.8.5.5, states in part that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures or drawings." Shearon Harris Specification CAR-SH-CH-6, "Concrete" and referenced ASTM Standard C-136 require that sieves used for grain-size analysis conform to the requirements of ASTM Standard E11.

Contrary to the above, discussions with responsible engineers indicated that sieves used for grain-size analysis of fine aggregates are not checked for conformance to ASTM Standard E11.

Corrective Steps Taken and Results Achieved

1. Procured Finescale Model No. 20 Magnifying Comparator and set of reticles for sieve sizes in question. (Received on site December 21, 1978)

2. Checked all sieves, sizes #4 through #200, in use and in stock, for conformance with ASTM Standard E11 nominal opening size requirements.

3. All sieves checked were found to comply with ASTM E11 requirements with respect to nominal opening sizes.

Corrective Steps Taken to Avoid Further Noncompliance

1. A written instruction has been drafted which requires marking and checking all sieves for conformance to ASTM E11 when received and visually checking fine aggregate sieves for holes and tears prior to each use.

Date When Full Compliance Will Be Achieved

January 5, 1979