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CP&L

Carolina Power & Light Company

April 6, 1979 79 APR 11 A8:51

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 February 27, 1979, referring to RII: RDB 50-400/79-02, 50-401/79-02, 50-402/79-01, and 50-403/79-01, the attached is Carolina Power & Light Company's reply to the deficiency as identified. It is considered that the corrective and preventive actions taken are satisfactory for resolution of this item.

Thank you for your consideration in this matter.

Yours very truly,

P. W. Howe
Vice President
Technical Services

NJC/gea (477/005)
Attachment

cc: Mr. J. A. Jones

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INFRACTION

Condition Reported:

A. As required by Criteron VI of Appendix B to 10 CFR 50, as implemented by commitments set forth in the PSAR, Chapter 1, Paragraph 1.8.5.6, . . . each participant in the program shall establish measures to assure effective document control . . . These measures provide a means to assure that obsolete documents are not used; that controls are exercised for document changes. CP&L Administrative Procedure AP-IX-02 in the SHNPP Construction Procedures Manual states that documents which have been affected by an RCI, FCR/PW, or DCN shall be stamped or marked to indicate that they are affected. In addition, document recipients are required to sign a transmittal form which indicates receipt of the documents and compliance with the disposition instructions prior to returning the transmittal to Document Control.

Contrary to the above, established measures do not provide a means to assure that obsolete documents are not used in that:

1. The following drawings selected from the stick files (control number 001) maintained in the Field Superintendent's trailer for the Fuel Handling Building and the Reactor Auxiliary Common Building were not stamped to indicate all of the applicable FCR's and RCI's.

   a. Drawing CAR-2167-G-1399R3 did not reflect that RCI-C-269 was applicable. The master drawing on file in Document Control also did not reference the subject RCI.

   b. Drawing CAR-2167-G-1610R3 did not indicate that FCR-C-336 was applicable.

2. The following drawings selected from the stick files (control number 035) maintained in the Field Engineering Office trailer did not indicate applicable revision level/all appropriate FCR/RCI documents:

   a. Drawing CAR-2167-G-1897R3 with FCR-C-188 outstanding is on file even though it has been superseded by revision 4. The Document Transmittal form on file in Document Control indicates that the recipient received revision 4 and destroyed revision 3.

   b. Drawing CAR-2168-G-153S01R7 does not reflect that FCR-AS-001, 002, 003 and RCI-C-52, 61, 76, 84 and 85 are applicable. It also references DCN-650-05 which applies to drawing CAR-2168-G-154S01 only. In addition, the master drawing indicated FCR-AS-004 was applicable although this FCR is applicable to drawing CAR-2168-G-153S02 only.

Corrective Steps Taken and Results Achieved:

1. Each example cited in the NRC inspection report was checked and the affected documents were corrected. Responsible personnel were instructed in the requirements of the document transmittal procedure.

2. A 100% audit was conducted during the period from January 29, 1979, to February 14, 1979, to determine if similar discrepancies existed. This audit identified other documents which were incorrectly stamped. These were corrected during the audit.

3. Site management implemented a review of procedures controlling Design Change Notices (DCN's), Field Change Requests (FCR's), Permanent Waivers (PW's), and Requests for Clarification of Information (RCI's) to develop recommendations for positive control.

4. The following procedural changes were made and implemented on March 19, 1979:

   a. A new Administrative Procedure AP-IX-15, Implementation of DCN's, FCR's, and PW's, which assigns responsibility and establishes a method to follow through and close out DCN's, FCR's, and PW's was developed.

   b. Procedure AP-IX-05, Field Change Request, was revised to assign responsibility for closing out FCR's and PW's.

   c. Procedure AP-IX-02, Document Control, was revised to delete the requirements for stamping documents affected by DCN's, FCR's, PW's, and RCI's.

5. Affected personnel were given written notification of the above changes and instructed to disregard stamping on the documents.

Corrective Steps Which Will Be Taken To Avoid Further Noncompliance:

Procedural changes requiring cognizant Discipline Engineers to monitor implementation and close out of DCN's, FCR's, and PW's were developed to provide positiv control.

Date When Full Compliance Will be Achieved:

Implementation of the current system of control for DCN's, FCR's, and PW's commenced on March 19, 1979, and retrofit of previously issued documents is expected to be completed by April 20, 1979.