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SUBJECT: Submits proposed rev to plant QA program for NRC approval.
 Proposed change incorporates document sampling program.
 Justification for change discussed.

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NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

SEP 2 1987

SERIAL: NLS-87-171
10CFR50.54

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
QUALITY ASSURANCE PROGRAM CHANGES

Gentlemen:

Carolina Power & Light Company (CP&L) hereby submits for NRC approval, a proposed revision to the Shearon Harris Nuclear Power Plant (SHNPP) Quality Assurance (QA) program. Because this change reduces a program commitment, NRC approval is required prior to implementation per 10CFR50.54(a)(3). The following provides a description and justification for the proposed change.

Currently, the SHNPP QA program requires that completed maintenance work request packages be reviewed by the Quality Organization to ensure that hold point requirements have been satisfied and necessary documentation attesting to the completion of the work has been generated. The proposed change reduces the quantity of maintenance work requests being reviewed by incorporating a document sampling program. The program requires that a sample of work requests be reviewed rather than each and every one. This change provides consistency between SHNPP QA program requirements and CP&L's other nuclear plant QA program requirements.

Although the proposed change reduces a program commitment, the revised program continues to provide assurance that hold point requirements would be satisfied and that necessary documentation attesting to satisfactory completion of the work would be generated. Thus, the SHNPP QA program would continue to meet the applicable 10CFR50, Appendix B criteria.

Pursuant to 10CFR50.54(a)(3)(iv), this QA program change will not be implemented until NRC approval has been granted. This program revision, if accepted, will be incorporated into the FSAR as shown in the attached mark-up.

If you have any questions, please call Mr. Steve Chaplin of our Nuclear Licensing staff at (919) 836-6623.

Yours very truly,

S. R. Zimmerman
Manager

Nuclear Licensing Section

SRZ/GB/lah (5260JDK)

Enclosure

cc: Mr. B. C. Buckley (NRC)
Dr. J. Nelson Grace (NRC-RII)
Mr. G. F. Maxwell (NRC-SHNPP)

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17.2.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

The SHNPP QA Program, as controlled by the Corporate QA Program, establishes requirements for the control of nonconforming materials, parts or components.

The Corporate QA Program addresses QA and other organizational responsibilities for the definition and implementation of activities related to nonconformance control. This includes identifying those individuals or groups with authority for the disposition of nonconforming items. The Corporate QA Program requires QA to document concurrence of the adequacy of corrective action and initiate follow-up action to verify proper implementation of the corrective action.

The program requires that material, parts, or components found nonconforming through review, inspection, surveillance, testing, or audits be controlled by administrative procedures. These procedures provide for the following:

- a) Identification of nonconforming items by use of nonconformance tags, stickers, or other appropriate status indicators and segregation of those items, if practical, to prevent inadvertent use pending proper disposition and reinspection.
- b) Identification of those individuals or organizations responsible for disposition of nonconforming items.
- c) Preparation of nonconformance reports which identify nonconforming items and describe the nonconformance, the disposition of the nonconformance, and the reinspection or testing performed to determine the acceptability of the item after the disposition has been completed.
- d) Verification of the acceptability of rework/repair of items by reinspection or testing of the item as originally performed or by a method which is equivalent to the original inspection and testing method.
- e) Nonconformance reports which are dispositioned "use as is" or "repair" are retained as part of the quality records.
- f) Quarterly analysis of selected reports as determined by QA be performed and forwarded to management to show quality trends.

on a sample basis by QA in accordance with approved procedures to

Nonconforming items that require rework/repairs by the plant maintenance organization are identified to the plant maintenance organization through the use of maintenance work request forms. Work request form packages include or reference procedures and instructions (including QA hold points) as required by which work has to be accomplished. Referenced procedures and instructions are reviewed and concurred by QA prior to start of work. Upon completion of the work, the maintenance work request form package is reviewed ~~by QA to~~ ensure QA hold point requirements have been satisfied and the necessary documentation, attesting to satisfactory completion of the work, has been generated. Work request form packages, where the resolution of the nonconformance is "accept as is", are also forwarded through QA. Quality Assurance in this case verifies that the documented engineering evaluation, justifying the "accept as is", ~~is part of the package.~~

in the sample above

Condition is referenced or included with the work request.

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