

CP&L

Carolina Power & Light Company

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November 7, 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 October 22, 1979, referring to RII: JRH 50-400/79-19, 50-401/79-19, 50-402/79-18 and 50-403/79-18, the attached is Carolina Power & Light Company's reply to the infraction identified in Appendix A. It is considered that the corrective and preventive actions taken are satisfactory for resolution of this item.

Thank you for your cooperation in this matter.

Yours very truly,

SP Zimmerman
for P. W. Howe
Vice President
Technical Services

NJC/jj

Attachment

cc: Mr. J. A. Jones

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INFRACTION

Condition Reported:

As required by Criterion V of Appendix B to 10CFR50, and implemented by Carolina Power and Light PSAR, Section 1.8.5.5, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, . . . and shall be accomplished in accordance with these instruction, procedures or drawings." Shearon Harris Procedures AP-IX-06, CQC-2, and TP-17 require that construction deficiencies be reported on Nonconformance Reports (NCR's), Discrepancy Reports (DR's), or Deficiency and Disposition Reports (DDR's).

Contrary to the above, concrete curing deficiencies, improper patching of concrete honeycomb, improper discharging of concrete, improper use of concrete vibrators and improper documentation of concrete data were reported on Quality Control File Report numbers: C-547, C-544, C-540, C-535, C-522, C-518; C-514, C-511, C-509, C-507, C-506, C-504, C-502, C-500, C-499, C-498, C-497, and C-489; but were not reported as NCR's, DR's, or DDR's.

Corrective Steps Taken and Results Achieved:

Of the eighteen (18) referenced Quality Control Field Reports, seven (7) involved local surface drying of concrete during the curing period. The incidents were regarded and handled as routinely correctable by extending the cure periods as specified by approved Field Change Request (FCR) C-525. The FCR provides the engineering (Ebasco) evaluation and resolution by extending the cure period. When out-of-cure conditions were noted, the Construction Inspection (CI) unit issued memos to notify Construction of the requirement to extend the cure periods. Cure extensions were noted in the Curing Log and in post-placement inspection records. Procedure TP-17, Construction Inspection Nonconformance Control, which addresses the resolution of nonconforming conditions by routine measures and FCR C-525, were the bases for issuing memos in lieu of Deficiency Reports. Notwithstanding the bases for the above described action in September, 1979, site management directed that CI issue Deficiency Reports to document all future curing discrepancies to provide management with the opportunity for early review of nonconforming conditions.

Two (2) of the referenced Quality Control Field Reports, C-509 and C-511, dealt with missing entries in the Curing Log. Nonconformance Report C-205 was issued to affect resolution.

One (1) of the referenced Quality Control Field Reports, C-498, reported a concrete repair which had not been performed properly. The repair was rejected by the Inspector, chipped out, and subsequently repaired in accordance with specification requirements. This is documented in concrete repair package LWPIW256018-P. This was regarded and handled as an in-process correction since the work had not been accepted.

Quality Control Field Report C-514 identified discrepancies related to the concrete repair program. Deficiency and Disposition Report (DDR) 297 was issued to affect corrective action. A follow-up survey was reported in Quality Control Field Report C-588.

Two (2) of the referenced Quality Control Field Reports, C-506 and C-522, were related to unsatisfactory pre-placement cleanup being noted by QA after the Concrete Placement Record had been signed off. In each case the cleanup was satisfactorily completed as the result of a QA hold-point inspection. QA Inspectors have been reinstructed to issue Nonconformance Reports whenever nonconforming conditions are found to exist after final inspections and acceptance sign-offs.



The remaining five (5) referenced Quality Control Field Reports involved in-process concrete placement deficiencies such as diagonal discharge and improper use of vibrators. Construction Inspection personnel are present full-time during concrete placing operations and take on-the-spot action to correct observed deficiencies. Where deficiencies are observed, extra precautions are taken to ensure proper consolidation of the concrete. When repetitive minor deficiencies in technique or severe deficiencies are noted, a Deficiency Report is issued. Deficiency Report C-264, issued July 26, 1979, is an example of reporting such deficiencies as nonconforming conditions. In September, 1979, Construction Inspection personnel commenced entering notations on the post-placement checklist to identify infrequent minor discrepancies in concrete placing techniques and that the discrepancies were corrected during the process. QA Inspectors have been instructed to indicate the significance of observed discrepancies in terms of extent, length of time, percent of the total, etc., in their field reports and to note any nonconformance reports issued.

Corrective Steps Taken to Avoid Further Noncompliance

Training sessions based on the requirement of Ebasco Specification CAR-SH-CH-06, Rev. 6, "Concrete," and the site procedures for concrete production and placement were conducted for craft, Construction Inspection and QA personnel during September and October, 1979. These were designed to improve compliance to concrete placement requirements and uniformity in controls.

In September, 1979, site management directed Construction Inspection personnel to document curing deficiencies on Deficiency Reports to provide management with the opportunity to review these conditions.

QA Inspectors have been reinstructed to issue nonconformance reports whenever nonconforming conditions are found to exist after final inspections and acceptance sign-offs.

QA Supervisors have been instructed to closely monitor the field reports for nonconforming conditions and to ensure these are reported in accordance with approved procedures.

Date When Full Compliance Will be Achieved

Full compliance is considered to have been achieved with the instructions and training sessions for the personnel involved.