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CP&L

Carolina Power & Light Company

March 21, 1980

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U.S. NRC REGION II
ATLANTA, GEORGIA

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 March 4, 1980, referring to RII: JJL 50-400/80-06, 50-401/80-06, 50-402/80-06, and 50-403/80-06, 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,

P. W. Howe
Vice President
Technical Services

NJC/lm

cc: Mr. J. A. Jones

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INFRACTION

Condition Reported:

As required by Criterion V of Appendix B to 10 CFR 50, 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 instructions, procedures or drawings." Paragraph 4.1.2.3 of CP&L procedure TP-08 states "To verify curve selection for moisture and percent compaction, the one-point proctor shall be completed for each density test."

Contrary to the above, one-point proctor tests were not completed for density test numbers, ESW-33, ESW-65, ESW-66, ESW-96, ESW-103, ESW-104, ESW-110, ESW-110R, ESW-124 and ESW-125. These density tests were performed on fill in the emergency service water canal.

Corrective Steps Taken and Results Achieved:

Discrepancy Report C-587 was issued February 22, 1980 to ensure proper resolution of the condition. Response to the Discrepancy Report addresses compliance with site procedures by evaluation of data available from inspection reports and completed testing. The fill material placed and compacted in the areas identified in the Notice of Violation has been evaluated and is considered acceptable based on the following:

1. The 10 density tests are considered valid since the inspector stated one-point proctor tests were completed to verify the proctor curves selected.

2. Density test data and the accompanying standard proctor curve data is documented in the QA Record Vault to verify that percent compaction and moisture content are within specification limits.

3. The inspector involved is experienced with the local material and, even if assuming no one-point tests were completed, the selection of curve by visual method would be considered adequate.

4. Additional density tests have been completed on material placed and compacted just prior to contractor winter months shut down and thereby satisfy the frequency requirements of TP-08. Moisture control and compaction methods were observed by inspectors at the time of placement. (Note: The quantity used by field inspectors to satisfy testing frequency requirements is based on load counts. The volume of material is computed in a loose state and after compaction will result in a reduction of 15-20% due to increased density. Therefore, the quantity reported above is conservative and in all cases the frequency of in-place material is better than actually reported).

Corrective Steps Taken to Avoid Further Noncompliance

During the Nuclear Regulatory Commission Inspector's visit, the Harris project soils inspection personnel were made aware of the violation and the procedural requirements were discussed. Prior to the Nuclear Regulatory Commission Inspector's visit a revised inspection report form was placed in use. The revised form requires combined entry of data

for density and one-point proctor tests and serves to alert the inspector to document the tests after their performance. It shall also be an aid in future data traceability.

Date When Full Compliance Will be Achieved:

Item is considered closed as of March 21, 1980.