CP&L

Carolina Power & Light Company

Raleigh, N. C. 27602

May 2, 1980

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 April 15, 1980, referring to RII:RDB 50-400/80-7, 50-401/80-7, 50-402/80-7, 50-403/80-7, the attached is Carolina Power & Light Company's reply to the deficiency 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 consideration in this matter.

Yours very truly,

P. W. Howe

P. W. Howe
Vice President
Technical Services

NJC:jp

Attachment

cc: Mr. J. A. Jones

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INFRACTION

Condition Reported:

As required by Criterion XV of Appendix B to 10 CFR 50, implemented by PSAR Section 1.8.5.15, measures shall be established to control materials which do not conform to requirements in order to prevent their inadvertent use. These material control measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition and notification to the affected organizations.

Contrary to the above, measures have not been established to control field storage and use of concrete curing compounds whose shelf life has expired. In addition, existing procedures for warehouse inspection and maintenance control do not provide for notification to affected organizations of material whose shelf life has expired.

Corrective Steps Taken and Results Achieved:

The nonconforming condition listed in the Notice of Violation was reported in Deficiency and Disposition Report No. 364 and in Nonconformance Report No. C-295 for purposes of control and resolution. The affected containers of Nutec-10 were segregated and placed on QA Hold status.

Four representative containers were selected containing unique batches of Nutec-10 curing compound with expired Manufacturer's Recommended Shelf Life dates. Batch # 6917B121, identified by the NRC Inspector, was included in those tested. The containers were immediately returned to the manufacturer for retesting and verification of conformance to Ebasco Protective Coating Materials specification CAR-SH-COR-1. The retesting by the manufacturer resulted in an approved extension from the recommended expiration date to September 18, 1980.

Corrective Steps Taken to Avoid Further Noncompliance:

A "suspense file system" was developed and implemented by the Warehousing Unit on March 11, 1980, whereby, all persons requisitioning any perishable items receive written notice five working days prior to that item's expiration date. In-Storage Inspection and Maintainance procedure AP-XIII-07, is being revised to define responsibilities of personnel and include further measures to control issuance of perishable items.

Date When Full Compliance Will be Achieved:

Full compliance is considered to have been accomplished through activation of the "suspense file system" and the extended shelf life expiration date granted from the manufacturer for the affected batches of Nutec-10 curing compound.