



Carolina Power & Light Company

Raleigh, NC JUL 27 02 A 8 : 08

June 26, 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 June 3, 1980, referring to
RII: VLB 50-400/80-12, 50-401/80-10, 50-402/80-10, 50-403/80-10, the
attached is Carolina Power and Light Company's reply to the deficiencies
identified in Appendix A. For items A, C, D and E, it is considered
that the corrective and preventive actions taken are satisfactory for
resolution. As stated in the attached response, item B will be within
full compliance by July 21, 1980.

Thank you for your cooperation in this matter.

Yours very truly,

P. W. Howe / ufe.

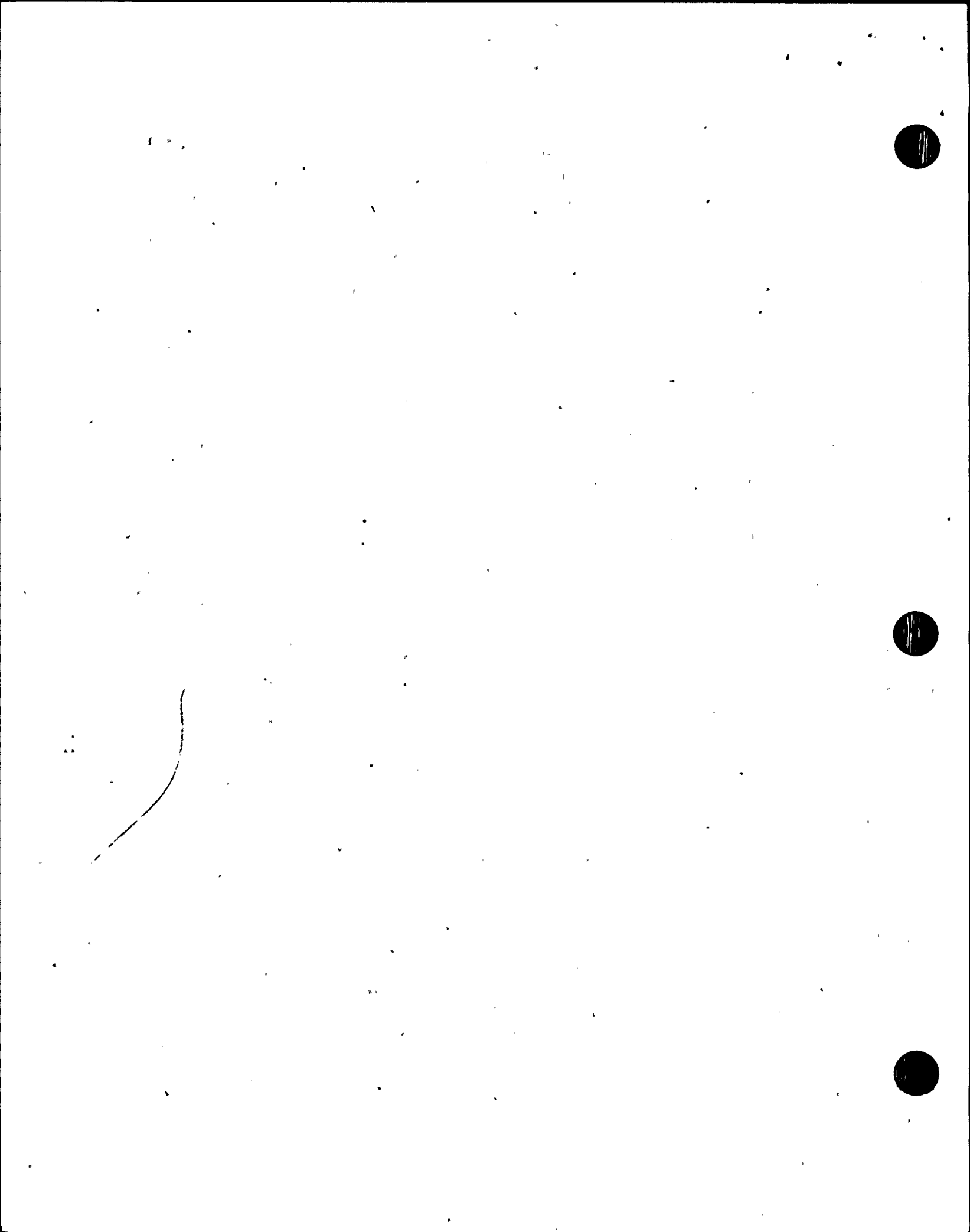
P. W. Howe
Vice President
Technical Services

NJC:jp

cc: Mr. J. A. Jones

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Response to NRC Team Inspection Infractions and Deficiencies

A. Condition Reported:

As required by 10 CFR 50, Appendix B, Criterion V implemented by Carolina Power and Light PSAR Section 1.8.5.5, "Activities affecting quality shall be prescribed by...procedures...and shall be accomplished in accordance with these...procedures..." CP&L Quality Assurance Audit Procedure QAAP-1, Section 6.3.6.5 states that when a nonconformance or program deficiency is identified during the audit, this will be reported to and should be acknowledged by management of the audited activity. QAAP-1 Section 6.5.4 requires that a written response to the audit report shall be submitted to the Manager of Corporate Nuclear Safety and Quality Assurance Audit when the audit findings contain nonconformances that require corrective action.

Contrary to the above, nonconformances were incorrectly identified as "concerns" (potential problems) in Shearon Harris Nuclear Power Plant audits 81-11, 81-12, and 81-13 of construction. Consequently, written responses were not required in all cases for nonconformances identified as concerns.

Corrective Action Taken and Results Achieved:

Revision 10 to Section 4.0, "Definitions", of procedure QAAP-1 was issued May 14, 1980. The revision to Section 4.0 involved the inclusion of definitions for the terms "finding" and "concern" and also established clarification of when a written response is required from the audited organization for a "concern". These definitions are as follows:

- a. Finding - A finding for the purpose of a corporate quality assurance audit is the same as a "nonconformance" as defined in the CP&L Corporate QA Program (e.g. Nonconformance - a deficiency in characteristic, documentation, or procedure which renders the quality of an item unacceptable or indeterminate).
- b. Concern - A concern for the purpose of a corporate quality assurance audit is an isolated deviation which does not violate specific quality requirements (codes, technical specifications, regulations, or other specific quality assurance commitments) and in the judgement of the auditors does not have a direct quality bearing on a plant system or activity.

Normally a concern does not require a written response; however, if in the judgement of the auditors, they feel the concern may rapidly deteriorate into a serious quality deficiency, corrective action may be requested of the audited organization in the audit report.

Corrective Steps Taken to Avoid Further Noncompliance:

In the past CP&L has essentially applied the aforementioned rationale findings and concerns; however, the definitions were lacking in clarity and as redefined should preclude any misunderstandings leading to nonconformances in the future.



Date When Full Compliance Will be Achieved:

The stated corrective actions were fully implemented as of May 14, 1980.

B. Condition Reported:

As required by 10 CFR 50, Appendix B Criterion XVIII implemented by Carolina Power and Light PSAR Section 1.8.5.18, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program..." The CP&L quality assurance audit program is structured to conform to N45.2.12 (Draft 3, Rev. 2). ANSI N45.2.12 (Draft 3, Rev. 2) paragraph 3.4.2 states in part: "Applicable elements of the quality assurance program shall be audited annually or at least once within the life of the activity, whichever is shorter..." ANSI N45.2.12 (Draft 3, Rev. 2) paragraph 3.3 states in part: "The audit system, including both internal and external audits shall be planned and conducted to assure coverage of the applicable quality assurance program."

Contrary to the above, a comprehensive system of planned and periodic audits has not been developed to assure coverage of all aspects of the Quality Assurance Program for non-ASME areas on an annual basis or at least once within the life of the activity, whichever is shorter.

Corrective Steps Taken and Results Achieved:

Carolina Power & Light Company has been auditing the active areas of construction to the applicable quality assurance criteria. In addition, we had under development a plan to cover the total scope of construction activities.

The following action is being taken to develop a comprehensive system to assure that all elements of the quality assurance program are audited annually:

All quality assurance procedures applicable to construction will be categorized and listed under the appropriate 10CFR50, Appendix B criterion. For example, those procedures that pertain to control of special processes will be listed under Criterion IX. This listing will include all 18 of the criteria in Appendix B, and will identify the implementing procedures for each criterion. This listing will identify the program elements to be audited annually and will also identify the procedures, applicable to each element. Space will also be included on the sheets to record when implementation of the procedure is audited. This listing provides a plan of the program elements to be audited and a record of what has been audited.

Corrective Steps Taken to Avoid Further Noncompliance:

Carolina Power & Light Company has audited and will continue to audit all active areas of construction to the applicable quality assurance criteria. The additional corrective action referenced will assure that in the future CP&L will not have noncompliances in this area.



Date When Full Compliance Will be Achieved:

Corrective action will be completed prior to the next scheduled audit of Harris construction site during the week of July 21, 1980.

C. Condition Reported:

As required by 10 CFR 50, Appendix B, Criterion XVI implemented by Carolina Power and Light PSAR Section 1.8.5.16, "In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective actions taken to preclude repetition."

Contrary to the above, corrective actions taken to preclude repetition were not effective in preventing repetition of deficient conditions noted by NRC on January 4, 1980 for concrete test cylinders.

Corrective Steps Taken and Results Achieved:

Nonconformance Report Number C-319 was written for purpose of control and resolution.

The effectiveness of the recently installed two (2) line overhead spray system was increased with the addition of another overhead spray line and reactivation of the dormant humidifying system. The combined system is operated from a timer controlled solenoid valve. There are now a total of 23 nozzles misting the curing room as compared to 13 prior to this audit.

Corrective Steps Taken to Avoid Further Noncompliance:

The installation of the additional spray nozzle line and reactivation of the humidifying system has proven to be sufficient to prevent future noncompliances of this type.

Date When Full Compliance Will be Achieved:

Full compliance was achieved on June 13, 1980.

D. Condition Reported:

As required by 10 CFR 50, Appendix B, Criterion II, activities affecting quality shall be accomplished under suitably controlled conditions such as adequate cleanliness. PSAR Section 1.8.1 states that this requirement will be met by compliance with ANSI N45.2.2 for warehousing activities. Section 6.2.4 of that Standard prohibits the use or storage of food or drinks in any storage area.

Contrary to the above, on April 29 and 30, 1980, both food and drinks were observed in Warehouse 6. The consumption of food was a routine practice, according to persons interviewed, for at least a two month period prior to these dates.





Corrective Steps Taken and Results Achieved:

An eating area has been designated away from stored materials and painted to indicate that no food or drink is allowed beyond this area.

All employees have been instructed as to the proper area for keeping/eating food and drinks. This action was completed immediately after the NRC inspection.

Corrective Steps Taken to Avoid Further Noncompliance:

This area will be monitored by supervisory personnel to help ensure conformity. Future nonconformances of this type should be eliminated with the newly designated eating/drinking area, counseling of warehouse employees to eat/drink only in designated areas and the supervisory monitoring effort.

Date When Full Compliance Will be Achieved:

Full compliance was achieved on April 29, 1980.

E. Condition Reported:

As required by 10 CFR 50, Appendix B, Criterion XVII, sufficient records shall be maintained to furnish evidence of activities affecting quality and shall include the records of the qualification of personnel. PSAR Section 1.3.1 states that the requirements of ANSI N45.2.2 will be followed for handling activities. Section 7.5 of the Standard requires that the responsible organization determine that personnel engaged in handling activities are competent and have demonstrated satisfactory ability in operating similar lifting equipment. Section 8 of the Standard requires records to be maintained to document this qualification.

Contrary to the above, no records of the qualification or training of warehouse lifting equipment operators was available on April 29, 1980. Interviews with both an operator and his supervisor indicated that the required training had been completed and only the documentation was lacking.

Corrective Steps Taken and Results Achieved:

A list of qualified materials handling equipment operators was published and posted on April 29, 1980.

Corrective Steps Taken to Avoid Further Noncompliance:

As new operators are designated for this function in the future, the Warehouse Supervisor will assure that records are maintained on file.

Date When Full Compliance Will be Achieved:

Item is considered closed as of April 29, 1980.