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DENTON,H.R. Office of Nuclear Reactor Regulation, Director

mx/4

SUBJECT: Forwards position re variances w/ANSI N45.2.2 per IE insp on 800428-0502.Position meets overall intent of prescribed QA. Util will continue current practices pending branch review.

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US NRC DISTRIBUTION SERVICES BRANCH

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NOS. 1, 2, 3, AND 4
DOCKET NOS. 50-400, 50-401, 50-402, AND 50-403
VARIANCES WITH ANSI N45.2.2

Dear Mr. Denton:

As a result of an inspection conducted by Mr. V. L. Brownlee of the USNRC Region II office on April 28 through May 2, 1980, inspector followup Item 400/80-12-10; 400/402/403/80-10-10 was identified. The inspector followup item set forth that Carolina Power & Light Company's (CP&L) activities at the Shearon Harris Nuclear Power Plant (SHNPP) were not in complete agreement with ANSI N45.2.2 as required by Section 1.8 of the SHNPP Preliminary Safety Analysis Report (PSAR). This letter and attachment amplify CP&L's position on ANSI N45.2.2 that was discussed with Mr. Brownlee during his inspection visit.

Carolina Power & Light Company believes that the position described in the attachment to this letter meets the overall intent of quality assurance prescribed by ANSI N45.2.2. CP&L will continue current practices pending NRR Quality Assurance Branch's review.

If you have any questions on this subject, please contact our staff.

Yours very truly,

M. A. McDuffie
Senior Vice President
Engineering & Construction

MAM/pfb (N#1)
Attachment

cc: Mr. J. P. O'Reilly (NRC-II)

B001 S 1/1

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

8011 1040 431

SHEARON HARRIS NUCLEAR POWER PLANT
CP&L'S POSITION ON ANSI N45.2.2

1. INTRODUCTION

No specific requirements are contained in this section and hence no clarifications or exceptions are identified.

2. GENERAL REQUIREMENTS

2.1 Planning - No clarifications or exceptions identified.

2.2 Procedures and Instructions - No clarifications or exceptions identified.

2.3 Results - The full requirements of this paragraph shall apply to the inspections and tests (QA/QC) that are performed to determine the acceptability of product quality; whereas the checking of secondary conditions such as warehouse temperature and humidity, inert gas blankets, rotation, lubrication, etc. are considered maintenance functions and need to be documented only to the extent necessary (checker, date, and results) that, through QA surveillance and review, will provide assurance that an adequate maintenance system is in effect.

2.4 Personnel Qualifications - Those personnel that perform inspection, examination, and testing activities for verification and acceptance/rejection purposes (QA/QC) for permanent plant items shall be qualified in accordance with N45.2.6 (except as amended by the safety analysis report position). Those personnel engaged in checking of secondary conditions (discussed in 2.3 above) shall be adequately trained to perform the function, though training records will not be required. Those personnel engaged in checking of product quality characteristics, such as periodic meggering, and lifting equipment inspection (less NDE), shall be adequately trained for the function and training records shall be maintained. All these personnel shall be familiar with the tools and equipment to be employed and shall have demonstrated proficiency in their use.

2.5 Measuring and Test Equipment (2.5.2) - That equipment which measures quality of the permanent plant items shall be under the calibration and control program; whereas the equipment used to measure secondary conditions, such as warehouse temperature, humidity, etc., will be maintained in good working order and checked for proper functioning when accuracy is in doubt, but not maintained under the calibration and control program. Traceability to calibration records will be provided when it is impractical (because of size, configuration or application) to physically mark calibration information on the item.

2.6 Housekeeping - The warehouse storage areas will be declared Zone IV in accordance with ANSI N45.2.3, and eating will be limited to designated areas. Signs will be posted in these areas accordingly.

[illegible]

2.7 Classification of Items - No clarifications or exceptions identified.

3. PACKAGING

3.1 General - No clarifications or exceptions identified.

3.2 Levels of Packaging - Site packaging for shipment off-site will be equal to or exceed the original packaging by the vendor, as required to assure the quality of the item is not degraded as a result of site shipping or handling. Vendor packaging with regard to barrier, containers, and crates will be maintained by the site provided that such packaging does not interfere with storage maintenance and/or that items are stored in an area where deleterious effects of shock, vibration, physical damage, water vapor, salt-spray, condensation, and weather are avoided.

3.3 Cleaning - No clarifications or exceptions identified.

3.4 Methods of Preservation - No clarifications or exceptions identified.

3.5 Caps, Plugs, Tapes and Adhesives - No clarifications or exceptions identified.

3.6 Barrier and Wrap Materials and Desiccants - The use of clear plastic in warehouses will be minimized. The guide rule is that the clear plastic shall be used only where periodic visual inspection is necessary. Plastic wrap on items supplied in accordance with a vendor's approved QA/QC program will be accepted and stored without rewrapping at the site.

On site storage protection will include the use of vinyl wrap materials due to the excellent fire retardant properties and availability. These materials contain halogenated compounds but leave only trace amounts of residuals under postulated exposures to sun, rain, etc. Therefore, they will not be prohibited from use on austenetic stainless steel products.

3.7 Containers, Crating and Skids - No clarifications or exceptions identified.

3.8 Cushioning, Blocking, Bracing and Anchoring - No clarifications or exceptions identified.

3.9 Marking - No clarifications or exceptions identified.

4. SHIPPING

Requirements of Section 4, Shipping, primarily applies to the vendor. Site functions with regard to return shipments will meet or exceed the methods of the vendor for the item.

5. RECEIVING

5.1 General - No clarifications or exceptions identified.

5.2 Receiving Inspection Requirements - Preliminary visual inspection will be performed prior to unloading, where practical, however, the receiving inspection of record will be performed in the unloading area. Item inspection will be performed in an area equivalent to the required storage level; except that temperature, humidity and airborne contamination controls will not be in effect during the inspection of items designated for Level B storage.

5.2.2(1) Identification and Marking - Item inspection will include inspection for identification and marking required by the purchase order documents. Marking that is not quality related or which provides no traceability will not be inspected.

5.3.1 Acceptable - Item acceptance status will be indicated by application of tags, stickers, ribbons, or signs. Storage areas are not designated as accept areas except for bulk items (e.g. rebar, structural steel, aggregate, etc.).

5.3.2 Nonconforming - Segregation will be accomplished where practical, or where necessary to control the inadvertent use of the item. Otherwise, the use of tags, stickers, ribbons, or signs will be so conspicuous as to imply segregation.

5.6 Marking - The clarifications and exceptions discussed in 5.2.2(1), identification and marking, apply to this paragraph.

5.7 Documentation - Receiving inspection records will provide traceability to the item and its status. Superfluous identification and tagging will not be recorded except when they are the subject of a nonconformance or specifically required by site inspection procedures.

6. STORAGE

6.1 General - No clarifications or exceptions identified.

6.1.1 Scope - The levels and methods of storage for items between the time of removal from the prescribed storage until placement in the installed location may be relaxed for short periods of time, according to the sensitivity of the item being handled and the elements of contact anticipated during this interval. Where relaxation of storage requirements of this standard are deemed appropriate, the item, conditions, precautions and follow-up inspection for assurance that quality of the item has been maintained will be prescribed in project procedures. (Example 1. A motor may be removed from Level B storage and moved via open-bed trailer and lifting cranes to the installed location. The relocation will not be permitted during inclement weather, with the motor unprotected, and the transfer will be completed in two days. Following installation the prescribed storage environment will be restored and the motor

subjected to inspection to verify that there was no degradation of quality during handling. Example 2. Reinforcing steel bars, shapes and outdoor equipment may be handled in staging areas without providing the level of protection from damage, trapping of water or loss of air circulation normally provided in a Level D storage area. The bars, shapes and equipment will not be allowed to remain in the staging area more than one week without providing the normal protection of Level D storage. During or following installation, the items will be subjected to inspection to verify that there was no degradation of quality during handling). Once the item is installed, the prescribed storage environment will be maintained except where prohibited by the type of work in progress (e.g. end covers and purges removed to accommodate installation activities).

6.2.4 Storage of Food and Associated Items - The use of food, drinks, and salt tablets will be permitted in areas adjacent to storage areas (e.g. the warehouse office area). Warehouse storage areas will be posted to prohibit eating and drinking except in designated areas.

6.3.5 Coverings - The clarifications and exceptions discussed in Paragraph 3.6, Barrier and Wrap Materials and Desiccants, apply to this paragraph.

6.4.1 Inspections and Examinations - QA surveillance of storage conditions and stored items is performed on a periodic basis to assure that storage maintenance personnel are performing and documenting the checks required by this paragraph.

6.4.2 Care of Items - Energizing space heaters (5) and rotation of shafts (7) will be performed as recommended by the manufacturer of the item. Other maintenance requirements specified by the manufacturer (8) may be relaxed following engineering evaluation of the item, the requirements and the anticipated results (e.g. A heat exchanger may be downgraded to Level D storage in lieu of Level C imposed by the vendor's instruction).

6.5 Removal of Items From Storage - The clarifications and exceptions discussed in other paragraphs of Section 6, Storage, apply to this paragraph as appropriate.

6.6 Storage Records - No clarifications or exceptions identified.

7. HANDLING

7.1 General - No clarifications or exceptions identified.

7.2 Methods and Procedures - No clarifications or exceptions identified.

7.3 Hoisting Equipment - The load chart for each crane includes the model number for that crane. This load chart is considered to be "Certification" by the manufacturer for that crane as required by paragraph 7.3.1. Likewise, forklifts are considered certified

by the manufacturer's literature giving maximum capacity as required by paragraph 7.3.2.

7.4 Inspection of Equipment and Rigging - Nondestructive examinations, witnessing of load tests and surveillance of operator maintenance inspections will be performed by QA/QC personnel qualified in accordance with ANSI N45.2.6 (except as amended by safety analysis report position). Operators will be trained in the operation and maintenance inspections of their assigned equipment.

7.5 Personnel - The responsible organization includes any contractor under contract to CP&L to perform general or special hoisting and lifting operations.

8. RECORDS

No clarification or exceptions identified.

9. STANDARDS, ETC.

No clarifications or exceptions identified.

## APPENDIX

A.3 PACKAGING

A.3.5.1 Caps and Plugs; A.3.5.2, Tapes and Adhesives; and A.3.6.3, Desiccants - Plugs, caps, tapes, adhesives, desiccants, markers and other temporary items will be of premium commercial quality. Permissible levels for halogens, sulfur, chlorides, low melting point metals, etc. for use on stainless steel and nickel alloy surfaces during the installation process will be held to minimum values within the limits of commercial availability of the products, and as provided for in the project procedures. Post-installation cleaning and inspection procedures will be implemented to ensure harmful levels of contaminants are removed prior to system operation.