CP&L

Carolina Power & Light Company

Raleigh, N. C. 27602

April 28, 1981

USNRC REGION II
ATLANTA, GEORGIA

81 MAY 4 A 9:01

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 3, 1981, referring to RII: GFM 50-400/401/402/403/81-06, the attached is Carolina Power & Light Company's reply to the deficiencies identified in Appendix A. It is considered that the corrective and preventive actions taken will be satisfactory for resolution of these items.

To the best of my knowledge, information, and belief, the corrective action in this report is true and complete.

Thank you for your consideration in this matter.

Yours very truly,

H. R. Banks
Manager
Corporate Quality Assurance

NJC:jp
Attachment

cc: Mr. J. A. Jones

Sworn to and Subscribed before me this 28th day of April, 1981.

Margaret L. Sparks
Notary Public

My commission expires June 5, 1984.

8105200 CPL

Severity Level V Violations

Conditions Reported:

A. 10 CFR 50, Appendix B. Criterion X as implemented by PSAR section 1.8.5.10; CP&L's Corporate QA Program Part I, section 8.3.4 and construction procedure QCI-19.2, section 5.1 and 5.1.1 requires site QA welding inspection personnel to conduct inspections at designated QA inspection hold points.

Contrary to the above, QA inspection hold points numbered one through five on the weld data report for containment penetration weld C1-265-M-108-AFPP were not witnessed or inspected by the site welding QA inspection personnel. On February 25, 1981 steps one through five on the weld data report for containment penetration weld M-108-AFPP were found to have been completed without being inspected by the site designated welding QA inspection group.

B. 10 CFR 50, Appendix B, criterion V as implemented by PSAR section 1.8.5.5 and CP&L's Corporate QA Program Part I, section 6.2.1.f requires procedures to contain sufficient detail to assure that activities important to safety have been satisfactorily accomplished.

Contrary to the above, construction procedure TP-40 revision 0 does not contain sufficient detail to determine the necessary education or experience required for mechanical or electrical inspection personnel. As of February 27, 1981 Construction Inspectors with very limited previous related education or experience are certified as unlimited mechanical and/or electrical inspectors and the Construction Inspection Supervisor responsible for the training, supervision and qualification of mechanical and electrical inspectors does not have sufficient education or background experience in either mechanical or electrical fields.

Denial or Admission and Reasons for Violations:

A. The violation identified by NRC audit was correct as stated. The QA Specialist (Welding) inadvertently returned the subject Weld Data Report to the Welding Engineering Group for their inspection of the welding.

B. The violation identified by NRC audit was correct as stated. Prior to the Construction Permit for the Harris Project, the Company had taken a position on Regulatory Guide 1.58 (and ANSI N-45.2.6) in that inspection personnel would not be certified to levels of qualification. The initial concept was to have inspection personnel qualified to subcategories of inspection activities in lieu of broad categories suggested by ANSI N-45.2.6. To do this, it was recognized that project procedures would need to specify the detailed requirements, or be written in more general terms to permit the latitude needed to accomodate this approach. Construction and Quality Assurance Management opted for the procedures to be in general insofar as education and experience requirements were concerned. The quality assurance procedures and the construction procedures that followed, continued to embrace the early approach. TP-40, Revision 0, evolved from this philosophy and as noted by the NRC inspector, was found lacking in detail to determine the necessary education and experience required for inspection personnel.

Contrary to the management philosophy identified above, several unlimited certifications were issued to personnel not fully qualified, though it was intended that necessary experience and training would be gained prior to performance of inspection on an unlimited scale. The procedure inadequacy cited by the NRC inspector is considered to be the primary reason that led to this action.

Corrective Steps Taken and Results Achieved:

A. Deficiency and Disposition Report No. 536 was written for control and resolution of this item. In addition to the referenced penetration, welding on two (2) other penetrations (M-109 and M-110) were also found to have been witnessed by the Welding Engineering Group instead of Welding QA. Although the welding of the penetrations was completed a certified affidavit was signed by the responsible Welding Engineering inspector who witnessed and/or verified the five mandatory hold points for each penetration in lieu of a QA inspector. Each of the referenced penetrations' welds were radiographed and found to be acceptable.

B. Revision 1 to construction procedure TP-40, "Training and Qualification of Construction Inspection Personnel", was issued March 23, 1981. The revised procedure sets forth explicit education and experience requirements for Construction Inspection Supervisors and the inspection personnel. The revised procedures also sets forth explicit training and qualification requirements for the various sub-categories of inspection activities, and thereby eliminates the issuance of unlimited certifications in a given discipline. Recognizing that circumstances beyond control of the Company may result in periods of nonavailability of personnel with the desired qualifications, the procedure provides for assistance from engineering disciplines in meeting requirements for the training and qualification of inspection personnel. Site quality assurance procedure CQA-1 was also revised on April 27, 1981, to incorporate education, experience and training requirements in the same style as that now in TP-40.

Graduate electrical and mechanical engineers have been assigned as Construction Inspection Supervisors for the electrical and mechanical inspection activities, respectively. The education and experience of the electrical and mechanical inspection personnel have been reviewed and the certifications of inspection qualifications have been narrowed in scope to be consistent with the requirements for the sub-categories of inspection activities identified in the revised procedure, TP-40.

Corrective Steps Taken to Avoid Further Noncompliance:

A. QA procedure, CQC-19 was revised and procedure MP-18 was developed and issued to clarify requirements for welding and inspection of Class MC components.

B. As previously stated, revisions to construction procedure TP-40 and quality assurance procedure CQA-1, have been issued to set forth requirements that will ensure that inspection personnel are properly qualified and will be under supervisory control of personnel with adequate technical education and/or related experience. Future certification for the inspection personnel will be issued in compliance with the revised procedures.

Date When Full Compliance Will Be Achieved:

A. Full compliance is considered to have been achieved with the issue of Revision 0 to CQC-19 on March 16, 1981, and with the issue of Revision 0 to MP-19 on April 23, 1981.

B. Full compliance is considered to have been achieved with the issue of Revision 1 to TP-40 on March 23, 1981, and with the issue of Revision 1 to CQA-1 on April 28, 1981.