



USNRC REGION II
ATLANTA, GEORGIA

Carolina Power & Light Company

31 SEP 18 10:00

September 11, 1981

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 August 13, 1981, referring to RII: WPK 50-400/401/402/403/81-13, the attached is Carolina Power & Light Company's reply to the deficiencies identified in Appendix A. Our evaluation of conditions relative to Appendix A, Item A.3 fail to indicate that a violation of procedures or commitments existed. Please consider the attached response information for possible reclassification of the item. It is considered that the corrective and preventive actions taken are satisfactory for resolution of items A.2, A.4-A.7 (inclusive), B.1 and B.2. It is considered that the corrective and preventive actions taken for item A.1 will be satisfactory for resolution of this item, once completed.

Thank you for your consideration in this matter.

Yours very truly,

Harold R. Banks
H. R. Banks
Manager
Corporate Quality Assurance



NJC/ps

Attachment

cc: Mr. J. A. Jones

Sworn to and Subscribed before me this
11th day of September, 1981.

Margaret L. Sparks
Notary Public

My commission expires June 5, 1984.

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SECURITY LEVEL V & VI VIOLATIONS

Conditions Reported:

A. 10 CFR 50, Appendix B, Criterion XIII as implemented by CP&L PSAR Section 1.8.5.13 requires measures be established to control storage and preservation of materials and equipment to prevent damage or deterioration. The storage requirements for air handling and coil units are contained in a Bahnson letter dated April 11, 1979, received onsite April 13, 1979. ANSI N45.2.2 "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase)" has been identified as the applicable standard for storage and handling. ANSI N45.2.2 prohibits the use of frayed or otherwise deteriorated rigging. ANSI N45.2.2 further requires the establishment of a program for the inspection of rigging including a system that will indicate acceptability. CP&L procedure WP-21, revision 0, "Inspection of Equipment and Rigging for General Lifting" is the controlling site inspection document for handling equipment and materials. Material and equipment storage are controlled by CP&L procedures: AP-XIII-05, revision 10, "Material Storage", PGD-001, revision 20, "Material and Equipment Storage Requirements", PGD-002, revision 12, "Material Maintenance Requirements During Storage for SHNPP", and AP-XIII-07, revision 14, "In-Storage Inspection and Maintenance". WP-21 requires rigging materials to be period color coded. PGD-001 requires fabricated piping assemblies to be capped. PGD-002 requires general inspections for damaged or missing caps. PGD-002 further requires that tape be impervious to water and not subject to cracking or drying out if exposed to sunlight, heat or cold. AP-XIII-05 requires piping assemblies to be stored on dunnage.

Contrary to the above, on July 7 to 10, 1981, measures were inadequate to control material and equipment storage and preservation in that the following conditions were noted:

1. A number of safety related air handling and coil units were improperly stored out doors. This condition went unidentified from April 1979 to March 1981.
2. Badly abraded and deteriorated cloth slings are used to lift, support or handle safety related materials and equipment.
3. On safety related materials and equipment, there is no documented inspection program for nonlifting rigging.
4. Cloth slings in the power block construction area are not period color coded.
5. Damaged pipe caps on numerous safety related piping assemblies.
6. Numerous examples of deteriorated tape used to seal safety related piping assemblies.
7. Numerous examples of safety related and balance of plant stainless steel piping subassemblies off dunnage in contact with mud.



- B. 10 CFR 50, Appendix B, Criterion XVII as implemented by CP&L PSAR Section 1.8.5.17 requires sufficient records be maintained to furnish evidence of activities affecting quality. The records shall include qualifications of personnel.

Contrary to the above, on July 10, 1981, sufficient records were not maintained to furnish evidence of activities affecting quality in that: the training and qualifications records for several welding inspectors did not reflect required class-room training, and the training and qualification records for one welding inspector indicated one year of QC/QA related experience when in fact, the individual had only 10 months QC/QA related experience.

Denial or Admission and Reasons for Violation:

- A. 1. The violation is correct as stated. During March and April of 1979, through exchange of correspondence with the manufacturer of the air handling units, CP&L assumed a posture that a quasi-agreement was in effect which permitted application of Level D storage for the units, except the associated motors would required Level B storage. CP&L proceeded on this basis with confidence that storage of the units and motors as planned, would provide adequate protection. Negotiations with the manufacturer in finalization of the storage program for the units, and appropriate revisions to the project procedures, failed to materialize.
2. & 4. The violation is correct as stated. Nylon slings were not placed under the inspection program due to limited use and difficulty in maintaining the inspection color code system.
3. The violation is denied as stated. It is CP&L's interpretation that the requirement for a documented inspection program is directed at the equipment and rigging used in "handling" items as discussed in ANSI N45.2.2, paragraph 7, Handling. The standard defines handling as: "The act of physically moving items by hand or by mechanical machinery, not including transport modes." The NRC Inspector reported observing a piping assembly secured to a vehicle for transit with deteriorated holddown straps, contrary to ANSI N45.2.2 paragraph 7.4.1; and cited the lack of a documented inspection program for nonlifting rigging, contrary to paragraph 7.4 of the standard. CP&L agrees that the observed holddown straps are nonlifting equipment, but that they were being utilized in a transport mode versus handling (lifting) mode - and as such, fall outside of the paragraphs cited. Inasmuch as the standard is found to be silent as to a documented inspection program for nonlifting rigging (sic), CP&L requests that this violation be rescinded.
- 5., 6. & 7. The violations are correct as stated. Routine handling operations result in damage to pipe caps and piping subassemblies falling off dunnage; and deterioration of sealing tape are continually occurring conditions. Personnel error in failing to observe and correct unsatisfactory conditions as they occur result in this type of violation.

- B. 1. This part of the violation is correct, but should be clarified as follows: The required classroom training had been accomplished but documentation was not available for the inspector's review.

The classroom training records in question are for those inspectors qualified for welding related inspection activities under revision number two of procedure CQA-1, Personnel Training and Qualification, dated March 16, 1981. During the period of the NRC inspection (July 7-10, 1981) these records were in the locked file of the Welding QA/QC Specialist (supervisor) who was on vacation. The supervisor had started a review of all these training records prior to going on vacation and had elected to keep them in his file until the review was completed.

2. The violation is correct as stated. The QA/QC Inspector Qualification/Certification form (QA-49, revision 4) in use at the time (May 27, 1980) the inspector in question was qualified as Stud Weld Inspector, provided a blank to indicate "years in QA/QC related work". The QA/QC Specialist determined that the candidate met the minimum experience requirement (six months), then rounded off to the nearest year (one) when he filled out the form.

Corrective Steps Taken and Results Achieved:

- A. 1. The air handling units have been inspected, and no significant deterioration of quality was found. Additional protection, in the way of metal awnings, has been installed to minimize internal exposure to rain. The units will be moved to level B storage, or placed in an allowed subordinate storage level following evaluation and revision of project procedures.
2. & 4. Nylon slings have been inspected and unacceptable slings rejected. Inspection color coding of the slings is being accomplished in accordance with project procedures.
- 5., 6. & 7. A general inspection and corrective work effort resulted in replacing of damaged pipe caps, returning pipe to dunnage and non-contact with the ground, and replacing deteriorated sealing tape.
- B. 1. Records to document required classroom training are prescribed by procedure CQA-1 and are normally maintained in the QA/QC Unit administrative files. Supervisory review of the training records in question was completed and the records were placed in the file on July 16, 1981.
2. The QA/QC Inspector Qualification/Certification form for the inspector in question has been corrected to read "10 months" instead of "1 year".



- A.
1. An evaluation of similar storage aspects is being made. Areas found to be weak or inadequate will be corrected to ensure compliance with project commitments.
 2. & 4. Nylon slings are now being inspected in accordance with project procedures. Procedure WP-21, "Inspection of Equipment and Rigging for General Lifting", is being revised to be more definitive in the inspection of nylon slings. A Procedure Deviation Notice was issued on September 4, 1981, to affect the above change until the procedure can be revised.
 - 5., 6. & 7. Through correspondence and meetings with construction personnel, management has reemphasized the storage requirements and the need to be constantly aware of actions and conditions that lead to these types of violations; and the need to take prompt corrective action to restore compliance with project requirements.
- B.
1. Supervisors have been instructed not to remove inspectors' training records from the file for extended periods. This should ensure that these records are available for review on short notice.
 2. The QA/QC Inspector Qualification/Certification form (QA-49) was revised on May 8, 1981, to indicate "total months" experience instead of years, making it highly unlikely to have future problems of this type.

Date When Full Compliance Will be Achieved:

- A
1. Full compliance will be achieved by December 1, 1981, at which time the evaluation of similar storage aspects will be complete.
 2. & 4. Full compliance is considered to have been achieved on September 4, 1981, with the issuance and implementation of Deviation 1 to revision 3 of procedure WP-21.
 - 5., 6. & 7. Full compliance is considered to have been achieved on August 31, 1981..
- B 1. & 2. Full compliance is considered to have been achieved on July 16, 1981.

