

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company

Docket Nos. 50-400, 50-401,
50-402, 50-403

Shearon R. Harris 1, 2, 3, & 4

License Nos. CPPR-158, CPPR-159,
CPPR-160, CPPR-161

As a result of the inspection conducted on July 7-10, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- 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.

This is a Severity Level V Violation (Supplement II.E).

- 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.

This is a Severity Level VI Violation (Supplement II.F).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: AUG 13 1981