



Carolina Power & Light Company

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October 12, 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 September 14, 1981, referring to RII: BRC 50-400/401/402/403/81-15, the attached is Carolina Power & Light Company's reply to the deficiency identified in Appendix A. It is considered that the corrective and preventive actions taken will be satisfactory for resolution of this item.

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/ecc
Attachment

cc: Mr. J. A. Jones

Sworn to and subscribed before me
this 12th day of October, 1981.

Notary Public

My commission expires:

February 18, 1985
Date

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Severity Level V Violation

10 CFR 50, Appendix B, Criterion V, as implemented by PSAR paragraph 1.8.5.5 requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with these procedures. Paragraphs 6.3.5 and 6.3.8 of Carolina Power and Light Company procedure CQC-19, "Weld Control," require that fitup inspection be performed on all full penetration Seismic Category I welds and that all Seismic Category I welds be inspected on monitoring basis and the monitoring inspection recorded on a weld inspection checklist.

Contrary to the above, on August 26, 1981, activities affecting quality were not being accomplished in accordance with documented procedures in that for fuel pool liner welding, classified as Seismic Category I by the PSAR, fitup inspections were not being performed and monitoring inspections were not being recorded on weld inspection checklists.

Denial or Admission and Reasons for Violation:

The violation is correct as stated; however, paragraphs 6.3.5 and 6.3.8 of Carolina Power & Light Company procedure CQC-19, "Weld Control" were not intended to apply to the fuel pool liner welds. These welds, while designated as Seismic Category I, are not structural welds. Inspection requirements for the fuel pool liner welds are provided in Ebasco Specification CAR-SH-AS-17, "Pool Liners". These requirements, visual inspection, liquid penetrant examination and vacuum box testing of completed weld surfaces, are to ensure the absence of leakage rather than structural integrity. CP&L will perform the required inspections and tests when liner welding is completed. Investigation revealed that monitoring of fitup has been conducted on a random basis, but that the assigned inspector did not document this monitoring because procedure CQC-19 did not address monitoring of the fuel pool liner welding.

Corrective Steps Taken and Results Achieved:

Procedure CQC-19, "Weld Control", Revision 2 was issued October 12, 1981 to clarify the scope of paragraphs 6.3.5 and 6.3.8; and to add the inspection requirements for fuel pool liner welds as specified in Ebasco Specification CAR-SH-AS-17. The procedure revision also includes the requirement for monitoring fuel pool liner welding activities, such as fitup, preheat and interpass temperature, in accordance with procedure CQA-22, "Welding Activity Monitoring". Monitoring of these activities on a routine basis was initiated immediately following the NRC inspection.

Corrective Steps Taken to Avoid Further Noncompliance:

The revision of procedure CQC-19, "Weld Control" to include requirements for inspection and monitoring of fuel pool liner welding is considered sufficient to prevent further noncompliances in this area.

Date When Full Compliance Will Be Achieved:

Full compliance is considered to have been achieved on October 12, 1981, with the issuance of revision 2 to procedure CQC-19, "Weld Control".