



Carolina Power & Light Company REGION II
ATLANTA, GEORGIA

October 27, 1981

81 NOV 2 A 8:46

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 October 2, 1981, referring to RII: GFM 50-400/401/402/403/81-19, 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/jp
Attachment

cc: Mr. J. A. Jones

Sworn to and subscribed before me
this 27th day of October, 1981.

Margaret A. Sparks
Notary Public

My commission expires:

June 5, 1984

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Severity Level VI Violation

10 CFR 50, Appendix B, Criterion V, as implemented by PSAR section 1.8.5.5; CP&L Corporate QA Program section 6.2.5 and construction procedure WP-110, section 3, "Installation of safety-related (seismic class I) pipe hangers" requires that if substitute materials are used for hanger installations, such substitutions shall be documented by memo, clarification request or surplus requisition form.

Contrary to the above, on August 25, 1981, documentation could not be provided by CP&L to show that materials which had been used as substitutes for spacer plate parts numbered 11 on Bergen-Paterson pipe hanger A-2-236-1-CC-H-1242, revision 3/D had been requisitioned in accordance with construction procedure WP-110.

Denial or Admission and Reasons for Violation:

The violation is correct as stated. The reason for the violation was personnel inattention to the methods prescribed for obtaining and documenting substitute material. The spacer plate substitute was obtained from qualified stock material, but the installing personnel failed to document the substitution.

Corrective Steps Taken and Results Achieved:

The hanger weld was cut to provide access to the spacer plate. The spacer plate purchase order identification was made and traced to the qualified stock material. A material substitution form was added to the hanger package to properly document substitution of the spacer plate.

A two-fold sampling approach was taken to determine if the reported violation was an isolated case or a generic condition. The information file of material substitutions was reviewed and found to identify twenty-two (22) recently installed hangers that contained substitutions. A field inspection was conducted to identify twelve (12) installed hangers that contained material substitutions. The hangers in the field were randomly selected and encompass the previous two-year work period. The work packages for these thirty-four (34) hangers were then reviewed and in each case the material substitutions were properly documented. As a result, the violation is considered to be an isolated case.

Corrective Steps Taken to Avoid Further Noncompliance:

Procedure WP-110, will be revised to require the use of the Construction Material Requisition Form exclusively for the documentation of material substitutions. A Procedure Deviation Notice was issued on October 21, 1981, to affect the above change pending revision of the procedure. This change will eliminate the variety of methods previously allowed. Responsible personnel have been instructed in the importance of material control and in the requirements of the revised procedure.

Date When Full Compliance Will Be Achieved:

Full compliance is considered to have been achieved on October 21, 1981, with the issuance of Deviation 3 to revision 5 of procedure WP-110.

1-1-78

