



Carolina Power & Light Company

RRPI

January 15, 1982

CQAD 82-73

Mr. James P. O'Reilly  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Northwest  
Atlanta, Georgia 30303

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USNRC REGION II  
ATLANTA, GEORGIA

50/400/c

Dear Mr. O'Reilly:

In reference to your letter of December 16, 1981, referring to RII:  
WPK 50-400/401/402/403/81-22, 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, once completed.

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 15th day of January 1982

Notary Public

My commission expires

12/7/86  
Date

OFFICIAL COPY

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SECRETARY OF THE  
TREASURY  
WASHINGTON, D.C.  
20548

## Severity Level V Violation

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 to prevent damage or deterioration. CP&L procedure WP-21 Revision 3, "Inspection of Equipment and Rigging for General Lifting", paragraph 4.4 requires approval prior to imposing any construction load on permanent plant equipment.

### Denial or Admission and Reasons for Violation:

The violation is correct as stated. Admittedly, there have been some temporary scaffolding loads applied to permanent plant equipment without written approval.

The applicable procedures WP-21, "Inspection of Equipment and Rigging for General Lifting" and WP-41, "Temporary Rigging from Embedded Plates" state that no rigging can be done from permanent plant equipment without written authorization. There was some confusion on the part of the crafts as to these requirements.

### Corrective Steps Taken and Results Achieved:

Nonconformance Report NCR-M-150, was issued on 11/20/81 to control known cases of unauthorized construction loads.

A memo was written from the Resident Mechanical Engineer to the General Mechanical Superintendent describing mechanical authorizations required prior to applying any temporary loads. Since the memo was issued, we have received no reports of unauthorized construction loads from permanent plant equipment.

In addition, RCI-M-166 provides guidelines to the Discipline Engineer and Area Engineers as to the allowable temporary loads that can be applied to permanent plant piping.

### Corrective Steps Taken to Avoid Further Noncompliance:

Work Procedures WP-21 and WP-41 are being revised to clarify that rigging from equipment applies to any temporary construction loads such as scaffolding. Also, WP-102 is being revised to incorporate the information included in RCI-M-166.

A site directive was issued on January 13, 1982, to all craft supervision to restrict application of construction loads. This interim restriction will be removed as appropriate procedures are revised.

Classroom training has been scheduled for the pipe crafts on January 19, 1982. Other crafts will be given classroom training before March 1, 1982.

### Date When Full Compliance Will be Achieved:

Full compliance will be achieved on March 1, 1982, with the completion of procedural revisions and craft classroom training.

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