



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-400/85-21

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Docket No.: 50-400

License No.: CPPR-158

Facility Name: Harris 1

Inspection Conducted: May 20-24, 1985

Inspector:

C. M. Upright for
L. H. Jackson

6/14/85-
Date Signed

Approved by:

C. M. Upright
C. M. Upright, Section Chief
Division of Reactor Safety

6/14/85-
Date Signed

SUMMARY

Scope: This routine, unannounced inspection involved 35 inspector-hours at license headquarters in the areas of licensee management of QA activities.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

H. R. Banks, Manager, Corporate Quality Assurance
C. Hensley, Project Vendor Surveillance Specialist
*T. L. James, Project Quality Assurance (QA) Engineer
*J. M. Johnson, Assistant to Department Head Special Projects
*H. J. Love, Jr., Principal QA Specialist - Training and Administration
*R. E. Lumsden, Manager, QA Services
*R. L. Mayton, Jr., Manager, Corporate Health Physics
*C. H. Moseley, Jr., Manager, Operations QA/Quality Control (QC)
*W. T. Poteat, Principal Vendor Surveillance Specialist
*C. A. Rosenberger, Principal QA Specialist - Performance Evaluation

Other licensee employees contacted included engineers and office personnel.

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on May 24, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below.

Inspector Followup Item - Verification of Applicable Elements of Audit Program, paragraph 4.d.

Inspector Followup Item - Update of Safety Analysis Report Concerning Radiation Levels in the Plant, paragraph 4.e.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Licensee Management of QA Activities (35060)

The purpose of this inspection was to determine the status and effectiveness of licensee management and implementation of the corporate quality assurance program for ongoing activities of design, procurement, audits, and construction.

a. QA Program Changes

On November 21, 1984, Carolina Power and Light Company (CP&L) submitted changes to the Shearon Harris Nuclear Power Plant Preliminary Safety Analysis Report (PSAR) reflecting revisions to the Quality Assurance Program. NRC accepted the submittal on January 22, 1985.

The organizational structure of the Corporate QA Department has remained essentially the same since Region II's last inspection of this area (Report 50-400/83-07) conducted March 8-11, 1983. Several personnel changes have taken place since March 1983. The Manager QA Services Section has been filled. The former Principal QA Engineer assumed the duties of Operational QA/QC, Harris Plant on May 1, 1985. Mr. T. L. James has assumed the duties of Principal QA Engineer. Mr. W. T. Poteat has assumed the duties as Principal Vendor Surveillance Specialist since the retirement of the previous Principal. Mr. C. A. Rosenberger has recently assumed the duties of Principal QA Specialist - Performance Evaluation.

The inspector held discussions with the Principals and confirmed their knowledge and understanding of the QA program. The qualifications and experience of these personnel were reviewed to determine that they were qualified and experienced in QA activities. Although several people are relatively new to these positions, overall effectiveness and independence of the audited portion of the Harris QA program has been retained.

The inspector reviewed the following QA procedures and verified that the latest changes implemented were approved at appropriate management levels and that document control requirements had been met:

<u>Procedure</u>	<u>Title</u>	<u>Control Copy Nos. Reviewed</u>
CQAD20-3, R0	Training and Qualification of Quality Assurance Engineering Unit Personnel	11, 41, 63, 74, 82
CQAD70-4, R0	Corporate QA Nonconformance Trending Reports	11, 41, 63, 74, 82
CQAD80-2, R3	Procedure for Training and Qualification of QA Program Audit Personnel	11, 41, 63, 74, 82
CQAD40-1, R2	Contractor and Supplier Evaluations	11, 41, 63, 74, 82
CQAD80-1	Procedure for Corporate QA Audits	11, 41, 63, 74, 82

Within this area, no violations or deviations were identified.

b. Licensee Reviews of QA Program Effectiveness

The Manager, Corporate Health Physics conducts semiannual independent assessments of CP&L compliance with appropriate aspects of the Corporate QA Program and applicable regulatory requirements. This independent assessment is conducted in accordance with "Procedure for Management Review of QA Audit Activities, R4." This independent assessment of corporate QA activities is distributed to the Chairman/ President, Executive Vice President, and Corporate QA Manager.

The inspector discussed the independent assessment of corporate QA activities with the Manager, Corporate Health Physics and reviewed Audits MR-13 and MR-14. These semiannual audits continued to evaluate activities pertaining to organizational, training, audits, and procedure compliance. Mr. J. W. Frye, QA Manager, Audit Division of Duke Power Company, was used to assist in the development of the inspection checklist and performance of Audit MR-14. This audit concluded that CP&L QA activities were effective and independence was maintained.

Within this area, no violations or deviations were identified.

c. Corporate QA - Site QA Interface

The Manager - QA/QC Harris Plant provides monthly reports of problem areas to the Manager - Corporate QA. Each of the Principals in the corporate office also provides reports to the Manager - QA Services who provides a monthly report to the Manager - Corporate QA. From these reports, plus reports from the Manager - Operations QA/QC, the Manager - Corporate QA provides a summary statement on audits, training, shop inspections, NCRs, receiving inspection reports, 50.55(e) and 10 CFR 21 items, off-system travel, and manpower to the Executive Vice President, Power Supply and Engineering and Construction. The detailed reports used to provide information for the summary are attached to the report. These detailed reports are used during trending, performance evaluations, shop inspections, and annual evaluations of vendors.

Within this area, no violations or deviations were identified.

d. Audit Program

The inspector reviewed the procedures listed in paragraph 4.a to confirm that they met requirements of the PSAR and the accepted QA program. Interviews with responsible QA management were conducted to ascertain that internal and external organizations and functions are being audited. Schedules and records were reviewed to verify that all elements of the program are audited within a reasonable timeframe.

CP&L performs three audits per year of Ebasco (their A-E) and Westinghouse (their NSSS). The three audits per year over a triennial period are intended to cover all applicable elements of the program. Other external audits of vendors are performed by the Performance Evaluation Group on a triennial basis.

Internal audits were preplanned and scheduled on a yearly basis and finalized quarterly. During 1984, 148 audits were performed. During the first five months of 1985, 53 audits had been performed. These audits included the NSSS, A-E, vendors, preoperational testing, construction, ASME Code installations, and engineering. Special audits are preformed as directed by management.

Each Principal in the QA staff has from 7 to 9 persons responsible for audits. Specialists needed to assist in audits were selected from within CP&L, if available, or from Ebasco. The number of auditors plus specialists from other groups appeared adequate to effectively conduct planned audits.

The inspector discussed the audit plans involving A-E and NSSS contractors with appropriate personnel to confirm their understanding of requirements. These discussions concerned the licensee's implementation of an audit program which includes appropriate elements of the QA program within the triennial period. The licensee audits Criteria I through VI and XV through XVIII from 10 CFR 50, Appendix B, as the applicable criteria for design audits. They consider criteria VII through XIV to be applicable to fabrication facilities; however, it does not appear that all applicable criteria from Appendix B were audited under the design audits. The licensee audits those elements from Criteria VII through XIV which he considers applicable when performing procurement audits; therefore, all criteria from Appendix B, may not be audited under the A-E and NSSS contracts unless covered during procurement audits. Until further evaluations can be performed, this item will be identified as Inspector Followup Item 50-400/85-21-01.

e. Audit Reviews

The inspector reviewed the audits listed below to confirm that audits were adequately planned, checklists were developed and used during the audit, checklists were maintained, audit findings were reported to management of the audited organization and CP&L management, corrective actions were required, verification and followup audits were conducted when necessary, and audit findings were closed based on verification of objective evidence.

Audit QAA/70-85-28 of Ebasco identified five findings and one concern. One of the findings identified that all personnel were not trained in the preparation of engineering calculations. Another finding identified that the source of data for radiation levels during the life of plant were not documented. The radiation levels in certain areas of

the plant appear to be higher than those shown in the Final Safety Analysis Report (FSAR). Until Ebasco responds to this finding and the licensee evaluates the response to determine if the FSAR requires updating, this will be identified as Inspector Followup Item 50-400/85-21-02.

Audit QAA/X100-85-01 of Harris Plant Engineering Section was performed during March 1985 and identified four findings; three of these findings were closed pending verification on May 6, 1985. The audit report included a statement which evaluated the effectiveness of the program and concluded that the program was satisfactory. The duration of the audit was five days. From the amount of data collected on the audit checklist and timely resolution of findings, the audit process appears to be effective.

Audit QAA/60-14 of United Engineers and Constructors, Inc., performed on March 13-15, 1983, identified nine findings and six concerns. Because of QA problems identified during this audit, CP&L removed this organization from the Approved Vendors List (AVL). Reapproval of this vendor was June 8, 1984. While removed from the AVL, this vendor was required to perform work in accordance with CP&L's QA program.

The qualifications of the Lead Auditor and Auditors who performed the above audits were examined. All were qualified and experienced in the areas audited.

Within this area, no violations or deviations were identified.

