

CP&L

Carolina Power & Light Company

P. O. Box 101  
New Hill, North Carolina 27562  
July 3, 1985

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*Prevatte*

Dr. J. Nelson Grace  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Northwest (Suite 2900)  
Atlanta, Georgia 30323

NRC-377

Dear Dr. Grace:

In reference to your letter of June 5, 1985, referring to RII: GFM/RLP 50-400/85-16, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

It is considered that the corrective action taken is satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Yours very truly,

*M. A. Watson*  
for R. A. Watson

Vice President  
Shearon Harris Nuclear Power Plant

RAW:sae

Attachment

cc: Messrs. G. Maxwell/R. Prevatte (NRC-SHNPP)  
Mr. B. C. Buckley (NRC)

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PDR ADDCK 05000400  
Q PDR

XEX-se7/1-OS5

*IE01 1/1*



1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for ensuring the integrity of the financial system and for providing a clear audit trail.

2. The second part of the document outlines the specific procedures for recording transactions. It details the steps involved in entering data into the system, from initial verification to final posting.

3. The third part of the document describes the various controls and checks that are implemented to prevent errors and fraud. It highlights the role of internal auditors and the importance of regular reconciliations.

4. The fourth part of the document discusses the impact of these procedures on the overall financial performance of the organization. It notes that while there may be some initial costs, the long-term benefits in terms of accuracy and efficiency are significant.

5. The fifth part of the document provides a summary of the key points discussed and offers recommendations for further improvement. It concludes by stating that the implementation of these procedures is essential for the success of the organization.



Reported Violation:

10 CFR 50.55(f)(1) requires CP&L to implement the quality assurance program described or referenced in the Preliminary Safety Analysis Report. Section 1.8.5.5 of the CP&L Quality Assurance Program requires that measures be established to insure that inspections are conducted in accordance with documented instructions, procedures, and approved drawings.

Contrary to the above, on May 14, 1985, the inspector identified at least two instances where electrical field modifications were being performed that did not meet the procedural requirements of construction work procedure "Installation of Seismically Supported Electrical Cable Trays, Conduit, Boxes, and Bus Ducts" (WP-203). In addition, the Electrical Field Modifications were not documented as a Field Change Request/Permanent Waiver (FCR/PW) within 5 days, as required by this procedure.

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

Denial or Admission and Reason for the Violation:

The violation is admitted with the following clarifications:

1. Electrical Discipline Engineers (Harris Plant Construction Section) through oversight failed to originate required documentation for design change approvals within the specified time span (5 working days).
2. WP-203 was interpreted by the implementing personnel to allow the processing of field modifications up to, but not including, final inspection and acceptance. The "authorization to proceed" was considered to be applicable to the inspection effort, as well as the work. Inspection control was still in effect since the procedure prohibited final inspection acceptance prior to approval of the FCR/PW associated with the modification.

Corrective Steps Taken and Results Achieved:

The Electrical Field Modification Log has been reviewed for additional discrepancies associated with the requirement to initiate an FCR/PW within five days of the issuance of a modification. Approximately forty-five (45) cases were identified where the five-day requirement was not met, though about forty (40) of these had been followed by the issuance of FCR/PW's, prior to the review. The remaining ones were resolved with the initiation of FCR/PW's following the review effort. NCR's 85-1293, 85-1530, and 85-1618, and QA Surveillance Report QASC-85-1223 identify the discrepancies found during the review.

availability : 1.30 pm

10. The Board shall have the authority to suspend or terminate the employment of any employee who is found to be in violation of the Code of Ethics.

[illegible]

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1. 1990年12月，在“中国—东盟”首脑会议上，中国领导人正式提出“中国—东盟自由贸易区”的构想。

1. The first of these is the fact that the Commission has not yet received any information from the Government of the United States regarding the results of its investigation of the activities of the American Friends Service Committee in the Philippines. It is therefore unable to make any statement regarding the results of its investigation.

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

[illegible]

Corrective Steps Taken to Avoid Further Noncompliance:

Electrical Discipline Engineers and Technicians responsible for electrical component installations covered by WP-203 have been reinstructed in the applicable procedural requirements.

Also, WP-203 has been revised to place the initiation and the approval of electrical field modifications under control of the Harris Plant Engineering section. The revision also requires that Construction Inspection be provided a copy of the modifications, and invokes the approved FCR/PW as a prerequisite to final inspection acceptance.

Date When Full Compliance Was Achieved:

Full compliance was achieved on June 28, 1985.

Administrative and Technical Information

The following information is being furnished to you for your information and is not to be used for any other purpose.

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