

CP&L

Carolina Power & Light Company

P. O. Box 101
New Hill, North Carolina 27562
July 19, 1985

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

NRC-380

Dear Dr. Grace:

In reference to your letter of June 19, 1985, referring to
RII: GAH 50-400/85-22-02, 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 time.

Thank you for your consideration in this matter.

Yours very truly,



R. A. Watson
Vice President
Shearon Harris Nuclear Power Plant

PERSONNEL OFFICE

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Attachment

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

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Attachment to CP&L Letter of Response to NRC Report RII:
GAH 50-400/85-22-02

Reported Violation:

10 CFR 50, Appendix B, Criterion V, as implemented by Preliminary Safety Analysis Report (PSAR) Chapter 17, Section 17.1.5, requires that activities affecting quality shall be accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above, on May 28, 1985, it was discovered that activities were not accomplished in accordance with the above in that Carolina Power and Light (CP&L) Procedure MP-07, Revision 19, "General Welding Procedure for Stainless Steel, Nickel Base and Nonferrous Weldments" dated March 22, 1985, failed to include the 1.0 percent maximum oxygen requirement to ensure adequate back purge when making butt welds with the gas tungsten arc welding process as required by upper-tier Specification No. 031, Revision 9, "Requirements for Field Welding of Category 1, 2, and 3 or code classes 1, 2, or 3 piping components, systems at the SHNPP Project."

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

Denial or Admission and Reason for the Violation:

The violation is correct in part. The correct procedure was being followed and requirements were in the procedure originally; however, during a subsequent Revision No. 15, February 14, 1984, a typographical error occurred in which the subject 1.0 percent maximum oxygen requirement was inadvertently omitted. The error was not identified during the revision review and approval process. The field practice, however, was not changed and no work problem occurred as a result of the typographical error.

Corrective Steps Taken and Results Achieved:

MP-07, Revision 20 was issued on May 29, 1985, to correct the subject typing error. Investigation has determined that site personnel were aware of the subject requirement, and no problems have been identified where improper purge was accepted. Since there was no change in the field practice of properly purging the oxygen during welding, no additional action is deemed necessary.

Corrective Steps Taken to Avoid Further Noncompliance:

Welding personnel involved in the review of procedures have been reminded to check for errors of this type prior to approval.

Date When Full Compliance Was Achieved:

Full compliance was achieved on July 9, 1985.

