CP&L

Carolina Power & Light Company

85 SEP 30 A7:50

P. O. Box 101
New Hill, North Carolina 27562
September 24, 1985

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

NRC-389

Dear Dr. Grace:

In reference to your letter of August 26, 1985, referring to RII: GFM/RLP 50-400/85-30-01, 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,

R. A. Watson

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

RAW:sae

Attachment

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

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 1.8.5.10 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 drawings.

Contrary to the above, on August 2, 5, and 6, 1985, the inspector identified documentation and hardware deficiencies involving welding, bolting, and reinforcing material for HVAC installations at Elevations 286' and 305' in the Reactor Auxiliary Building. The installations had been previously inspected and accepted by Quality Control and Construction Inspection personnel, and the documentation packages had been reviewed and placed in the QA vault.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The hardware deficiencies noted were caused by craft error or inadvertent damage by craft after installation and inspection. The documentation discrepancies were a result of errors in preparation of work packages by Construction Engineering personnel. Lack of attention to details by CI Inspectors led to the acceptance of the noted hardware and documentation deficiencies.

Corrective Steps Taken and Results Achieved:

Nonconformance Reports 85-1791, 85-1804, and 85-1805 were issued to control and disposition the identified hardware and documentation deficiencies. The identified documentation deficiencies have been resolved by correcting the appropriate work packages. The identified hardware deficiencies have been corrected by rework with the exception of the bent flange corner (Package #HV/1-G-806-009) which was evaluated by HVAC Engineering and was found to be acceptable, and the stitch fillet weld fit-up gap (Package #HV/1-G-508-S01-002) which was determined to be acceptable per the applicable Welding Procedure, MP-17 "General Welding Procedure for HVAC Duct Systems".

Corrective Steps Taken To Avoid Further Noncompliance:

Responsible craft personnel have been reinstructed in the requirements of WP-402 "Installation of Ductwork". A training session on WP-404 "HVAC Ductwork Work Package Generation" was held for responsible Construction Engineering personnel.

Appropriate Construction Inspection personnel have received additional training in TP-56 "Inspection of the Installation of Nuclear Safety Ductwork", WP-402, WP-404, and MP-08 "General Weld Procedure for Structural Steel".

In addition, FCR-HVAC-1435 and a revision to TP-56 were issued to clarify installation and acceptance criteria concerning double nut tightness.

Date When Full Compliance Was Achieved:

Full compliance was achieved on September 24, 1985.