



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

Report No.: 50-400/86-58

Licensee: Carolina Power and Light Company  
 P. O. Box 1551  
 Raleigh, NC 27602

Docket No.: 50-400

License No.: CPPR-158

Facility Name: Harris 1

Inspection Conducted: July 14-18, 1986

Inspector: *R. W. Wright* 8/7/86  
 R. W. Wright Date Signed

Approved by: *G. A. Belisle* 8/7/86  
 G. A. Belisle, Acting Section Chief Date Signed  
 Quality Assurance Section  
 Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection was conducted in the areas of in-depth quality assurance (QA) inspection of performance, and licensee action on previous enforcement matters.

Results: No violations or deviations were identified.

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## REPORT DETAILS

## 1. Persons Contacted

## Licensee Employees

- \*N. Chiangi, Manager Quality Assurance/Quality Control (QA/QC)
- K. Douglas, Quality Assurance Specialist
- \*G. Forehand, Director QA/QC
- \*S. Hardy, Fire Protection Specialist-Harris Plant Engineering Section (HPES)
- \*K. Hate, Principal-QA Engineer
- \*L. Loflin, Manager HPES
- J. Pinto, Fire Protection Specialist-Consultant for HPES
- \*C. Phillips, Penetration Supervisor, Construction Engineering
- \*R. Somers, Superintendent, Construction Inspection (CI)
- \*D. Sugg, Unit Supervisor, Civil/Mechanical (CI)
- \*H. Taylor, Sub Unit Supervisor, Penetration Seals & Anchors, (CI)
- \*M. Wallace, Specialist, Regulatory Compliance
- \*J. Willis, Plant General Manager

Other licensee employees contacted included construction craftsmen, engineers, technicians, QA/CI personnel and office personnel.

## Other Organizations

M. Walsh, B&B (Promatec) QA Representative  
 S. Goss, B&B (Promatec) Engineer  
 NRC Resident Inspectors

\*G. Maxwell

\*Attended exit interview

## 2. Exit Interview

The inspection scope and findings were summarized on April 18, 1986, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. 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 (92702B)

(Deleted) Severity Level V Violation (400/86-25-01): Failure To Provide Adequate Acceptance Criteria To Initiate Penetration Sealing Inspections . The licensee's response dated June 12, 1986, denied the subject violation based on the position that the penetration seals identified are not subject to the requirements of 10 CFR 50, Appendix B. Discussions with responsible



HPSE personnel and examination of pertinent design data for the subject penetration seals identified that the penetration seals in question were installed for radiation (ALARA) shielding purposes. They are not required for the safe shutdown of the plant and are neither safety-related nor fire protection items. This violation has been withdrawn and our records have been updated to reflect this position.

#### 4. In-Depth QA Inspection of Performance (35061)

This inspection was performed to determine whether site work was being accomplished in accordance with Safety Analysis Report (SAR) commitments, that the QA/QC program was functioning in a manner to assure that commitments were met, and that prompt and effective action was taken to achieve permanent corrective action on significant discrepancies. Selected ongoing installation and work activities concerning penetration seals were examined by the inspector in the following areas to verify these inspection objectives.

##### a. Work Procedures

The inspector selected and reviewed the following listed specifications and procedures to verify that they contained SAR commitments, proper qualitative or quantitative acceptance criteria, and that necessary changes are incorporated into procedures as required.

CAR-SH-AS-60	Penetration Barrier Fire Stop Assemblies, Internal Conduit Seals, and Fire Breaks Non-Nuclear Safety Equipment, R2
TP-69	Inspection of Penetration Seals, R5
WP-148	Penetration Seals and Installation, R4, R5

##### b. Field Inspection

The inspector observed ongoing work activities for the following penetration seal installations which were found in various stages of completion:

##### Penetration Number

H621	E4198	E464E	E394E
H681	E3357	E449F	E394D
E4094	E3594	E468E West	E468D East
E4094A	E3611A	E394C Top	E468D West

The inspector observed craftsmen at work, conducted discussions with randomly selected craftsmen and foreman, and determined that

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their knowledge of penetration sealing operations was adequate to provide the required quality of workmanship.

c. Quality Control

The inspector reviewed inspection records (Penetration Closure Verification Sheets, Material Density Verifications) associated with several of the previously listed seal installations to determine their adequacy, whether deficiencies submitted by inspection personnel received proper corrective action, where applicable, and if work and work controls were adequate. The inspector reviewed the applicable QC inspection procedures (paragraph 4.a) to determine if the frequency, timing, and acceptance criteria for the inspection was adequate. The number of CI inspectors provided for the coverage of these work activities was considered satisfactory.

The inspector accompanied several randomly selected CI sealant inspectors during their inspections and conducted discussions with them to determine if their knowledge of the activities they were observed inspecting was adequate. While accompanying one such recently assigned inspector, who was found to be a very thorough inspector and knowledgeable of his acceptance criteria, the RII inspector observed that he properly rejected a Silicone RTV foam seal (Penetration No. E4198A Top) on his inspection records for inadequate curing. Although he did not option to do so, subsequent discussions with this new inspector identified he thought an acceptable alternative would have been to simply not accept the installation (i.e., not document anything) telling the crafts why the seal was rejected so they could rework it as necessary to resolve the discrepancy so it would pass a subsequent CI inspection. This appeared to be an isolated case in that no other sealant inspector interviewed felt he had this option. The inspector informed the subject sealant inspector that his alternative concept was wrong in that it did not agree with procedure CQA-3, Nonconformance Control nor the licensee's QA program. Upon notification of this erroneous concept, the CI Penetration Seals Supervisor reinstructed his inspection personnel on subordinate nonconformance reporting to assure continued uniformity of the inspection process. Other than this apparent isolated incidence, discussions conducted with randomly selected sealant inspectors determined that they were knowledgeable of their inspection functions and acceptance/rejection criteria and were proficient in the performance of their assigned tasks.

d. Materials and Equipment

The inspector examined the sealant materials being utilized for acceptable shelf life, the sealant dispensing machinery for cleanliness and proper operation and the platform scales (ID Nos.

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Resolved, That the Board of Directors of the Bank of America and Trust Company of New York do hereby authorize the Board of Directors of the Bank of America and Trust Company of New York to execute and deliver to the Board of Directors of the Bank of America and Trust Company of New York a resolution of the Board of Directors of the Bank of America and Trust Company of New York...

Resolved, That the Board of Directors of the Bank of America and Trust Company of New York do hereby authorize the Board of Directors of the Bank of America and Trust Company of New York to execute and deliver to the Board of Directors of the Bank of America and Trust Company of New York a resolution of the Board of Directors of the Bank of America and Trust Company of New York...

ATTEST: SECRETARY

THE BOARD OF DIRECTORS OF THE BANK OF AMERICA AND TRUST COMPANY OF NEW YORK

CPL 5866B and CA 5880 B) used for material density verification for current calibration stickers.

e. QA Surveillances and Audits

The inspector reviewed the following QA site surveillance reports and the results of the supervisory audit conducted on each penetration seal inspector for the month of June 1986:

QASC NOS: 86-0008, 86-0037, 86-0057, 86-0162, 86-0237,  
86-0258, 86-0297, 86-0496, 86-0886, 86-0891, 86-0892,  
86-0893, 86-0894, and 86-0895

The above surveillances were examined to determine if they were meaningful, effective, reflect quality performance, and whether corrective actions taken as a result of the surveillance findings were proper, timely, and complete.

Within the areas inspected, no violations or deviations were identified.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for the proper management of the organization's finances and for ensuring compliance with applicable laws and regulations.

2. The second part of the document outlines the specific procedures that should be followed when recording transactions. This includes the use of standardized forms and the requirement that all entries be supported by appropriate documentation.

3. The third part of the document discusses the role of the accounting department in the overall financial management process. It highlights the department's responsibility for providing timely and accurate financial information to management and other stakeholders.

4. The fourth part of the document addresses the issue of internal controls. It explains how these controls are designed to prevent and detect errors and fraud, and how they contribute to the overall reliability of the financial statements.

5. The fifth part of the document discusses the importance of regular audits. It explains how audits provide an independent assessment of the organization's financial health and help to identify areas for improvement.

6. The sixth part of the document discusses the role of the board of directors in the financial management process. It highlights the board's responsibility for overseeing the organization's financial performance and for ensuring that the financial statements are accurate and reliable.

7. The seventh part of the document discusses the importance of transparency in financial reporting. It explains how transparency helps to build trust with investors and other stakeholders and how it is essential for the long-term success of the organization.

8. The eighth part of the document discusses the role of the financial reporting process in the overall financial management process. It highlights the importance of providing timely and accurate financial information to management and other stakeholders.

9. The ninth part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for the proper management of the organization's finances and for ensuring compliance with applicable laws and regulations.

10. The tenth part of the document discusses the role of the accounting department in the overall financial management process. It highlights the department's responsibility for providing timely and accurate financial information to management and other stakeholders.