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SUBJECT: Responds to NRC request for addl info to support sampling approach in 870902 QA program change. Change would allow final review of work requests & authorizations on a sampling basis. Rev will be incorporated into FSAR if acceptable.

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 TITLE: 50.54. a.3 & 50.55. f.3 Change to SAR QA Program

NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
QUALITY ASSURANCE PROGRAM CHANGES

Gentlemen:

Carolina Power & Light Company (CP&L) submitted a Quality Assurance (QA) Program Change on September 2, 1987 which would allow a reduction in the quantity of Work Requests & Authorizations (WR&As) reviewed by the on-site Quality Assurance Organization. The intent of the requested change is to allow the QA review to be performed on a statistical sampling basis as opposed to reviewing each safety-related WR&A. This would make the SHNPP program consistent with the programs for QA reviews of WR&As at our Brunswick and Robinson nuclear plants and provides an accepted method of quality validation.

Subsequent to the submittal of the proposed QA Program Change, the NRC requested additional information to support the change to the sampling approach. This letter provides CP&L's response to the staff's request. The program change would allow final review of WR&As on a sampling basis, consistent with the demonstrated need for review. If at any time the statistical data from the sampling reviews indicate a problem, the sample size will be increased, up to 100 percent if necessary, until the situation is corrected. Conversely, when statistical data from the sampling reviews indicate compliance with procedural mandates, the sample size may be reduced. Industry accepted statistical techniques will be employed throughout the sampling process to establish a very high degree of confidence in compliance. The sampling approach allows the QA program to match the demonstrated need for review without mandating excessive review (i.e., 100%) when the need has not been established. It should also be noted, the WR&As are accepted/rejected as a complete package. Therefore, a WR&A can be rejected for any number of reasons including clerical and/or administrative errors. This is a very conservative approach to statistical sampling. In addition the programs and procedures exercised on safety-related components will continue to undergo a complete QA review prior to the work being performed.

Carolina Power & Light Company's experience at the Brunswick and Robinson nuclear plants indicate that a QA review of all safety-related WR&As is not needed to assure hold-point requirements are satisfied and the required documentation is generated. This experience at our other sites provides additional justification for shifting to a sampling review program.

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The sampling program approach does not significantly reduce the effectiveness of the QA program assurances that WR&As receive proper and adequate review to identify discrepancies pursuant to Section XV of 10CFR50, Appendix B. After NRC approval of the change, Carolina Power & Light Company will maintain the sample review rate at 100% until the statistical review data demonstrates a smaller percentage is appropriate.

The program revision, if accepted by the NRC will be incorporated into the FSAR as shown in the attached mark up. This mark up supersedes that submitted with our September 2, 1987 letter and reflects minor changes for purposes of clarity.

Yours very truly,



S. R. Zimmerman
Manager

Nuclear Licensing Section

SDC/bmc (5367SDC)

cc: Mr. B. C. Buckley (NRC)
Dr. J. Nelson Grace (NRC-RII)
Mr. G. F. Maxwell (NRC-SHNPP)

17.2.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

The SHNPP QA Program, as controlled by the Corporate QA Program, establishes requirements for the control of nonconforming materials, parts or components.

The Corporate QA Program addresses QA and other organizational responsibilities for the definition and implementation of activities related to nonconformance control. This includes identifying those individuals or groups with authority for the disposition of nonconforming items. The Corporate QA Program requires QA to document concurrence of the adequacy of corrective action and initiate follow-up action to verify proper implementation of the corrective action.

The program requires that material, parts, or components found nonconforming through review, inspection, surveillance, testing, or audits be controlled by administrative procedures. These procedures provide for the following:

- a) Identification of nonconforming items by use of nonconformance tags, stickers, or other appropriate status indicators and segregation of those items, if practical, to prevent inadvertent use pending proper disposition and reinspection.
- b) Identification of those individuals or organizations responsible for disposition of nonconforming items.
- c) Preparation of nonconformance reports which identify nonconforming items and describe the nonconformance, the disposition of the nonconformance, and the reinspection or testing performed to determine the acceptability of the item after the disposition has been completed.
- d) Verification of the acceptability of rework/repair of items by reinspection or testing of the item as originally performed or by a method which is equivalent to the original inspection and testing method.
- e) Nonconformance reports which are dispositioned "use as is" or "repair" are retained as part of the quality records.
- f) Quarterly analysis of selected reports as determined by QA be performed and forwarded to management to show quality trends.

Nonconforming items that require rework/repairs by the plant maintenance organization are identified to the plant maintenance organization through the use of maintenance work request forms. Work request form packages include or reference procedures and instructions (including QA hold points) as required by which work has to be accomplished. Referenced procedures and instructions are reviewed and concurred by QA prior to start of work. Upon completion of the work, the maintenance work request form packages ^{ARE} reviewed by QA to ensure QA hold point requirements have been satisfied and the necessary documentation, attesting to satisfactory completion of the work, has been generated. Work request form packages, where the resolution of the nonconformance is "accept as is", are also forwarded through QA. Quality Assurance in this case verifies that the documented engineering evaluation, justifying the "accept as is", is part of the package. Responsibility for

OR REFERENCED IN