



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA ST., N.W., SUITE 3100  
ATLANTA, GEORGIA 30303

SEP 10 1979

In Reply Refer To:  
RII:WAR  
50-324/79-27  
50-325/79-28

Carolina Power and Light Company  
Attn: J. A. Jones, Senior Executive  
Vice President and Chief  
Operating Officer  
411 Fayetteville Street  
Raleigh, North Carolina 27602

Gentlemen:

This refers to our letter dated September 4, 1979 which forwarded inspection report 50-324/79-27 and 50-325/79-28. Due to an error on our part, details pages 4 through 9 contain several transformations of information as well as omissions of other information. Please replace pages 4-8 of the referenced report with the enclosed pages 4-8.

We regret any inconvenience this may have caused you.

Should you have any question concerning this letter we will be glad to discuss them with you.

Sincerely,

*R. C. Lewis*  
R. C. Lewis, Acting Chief  
Reactor Operations and  
Nuclear Support Branch

Enclosure: Replacement pages 4-8 of  
Inspection Report 50-324/79-27  
and 50-325/79-28

cc: A. C. Tollison, Jr.  
Plant Manager  
Box 458  
Southport, North Carolina 28461

1210 025

7910250 569

by 10 CFR 50.59(b). The inspector verified that the licensee's use of the word "unresolved" in response to this item was meant to be "unreviewed." With that clarification, the licensee's response was then inspected. The licensee stated that "Revisions to this procedure (ENP-3) approved on February 9, 1979, require written bases on all modification packages." While the subject procedure had indeed been revised as of February 9, 1979, the changes required that "Comments" be included on each modification form, not "written bases" for the determination that the modification does not involve an unreviewed safety question. In addition, the inspector reviewed selected safety-related modifications (#79-165, vessel level transmitter; #79-156, D/G saddle tank vents and Battery Room fire dampers; #79-090, drywell penetration seismic support; #79-083, bearing temperature monitor installation; 79-031; reactor recirculation system, setpoint change). In each of these cases, "comments" had been placed on the form as required by the procedure. In 3 (79-165, 79-083, 79-031) of the 5 examples reviewed, these "comments" did not contain the bases for the required determination; in the remaining examples the "comments" did provide a bases for the required determination. Since the procedure had not been revised to require a bases for the required determination as the licensee had stated in his response and since 3 examples were found where the bases were not included, a deviation from the licensee's commitment to the NRC exists and is designated (324/79-27-02, 325/79-28-02). The inspector's sample was a random basis and should not be used to conclude that three-fifths of the modifications did not include the records of the bases. As with the original citation, the deviation deals with records (required by 10 CFR 50.59(b)) not with inadequate engineering determinations.

(Open) Infraction (324-325/79-02-08): Appendix A, item B, failure to establish housekeeping, recordkeeping and document control programs which meet the requirements of the accepted QA Program's commitments to ANSI N45.2.3, N18.7, and N45.2.9. The licensee combined recordkeeping and document control issues when making his response, and he delineated 7 items which would be accomplished to effect corrective actions. The first commitment further stated that changes would be made as a result of that study; the budget items have been submitted, but the required changes have not yet been made. The remaining 6 items referenced in the response were inspected and found as stated except the revision to AI-2 (covering items 6 and 7 was accomplished on July 13, 1979, as opposed to June 30, 1979, as stated). With respect to housekeeping, the licensee gave a response indicating that a program would be implemented by September 1, 1979. Since the due date had not arrived as of this inspection, this item was not reviewed. However, as part of a fire prevention program inspection (50-324/79-28, 50-325/79-29) two areas were found (cable spreading room and battery room) with unacceptable housekeeping practices. These areas were cleaned up prior to the end of the inspection and the referenced report should be consulted for additional details. Until the housekeeping program is implemented and the changes recommended by the records review study have been implemented, this item remains open.

(Open) Infraction (324-325/79-02-09): Appendix A, item C, failure to establish measures to assure the calibration of safety-related instrumentation used to verify LCO conditions but not specifically required to be calibrated by the Technical Specification. As indicated in the licensee's response, the instruments have been identified. The licensee was in the process of writing calibration procedures, but the stipulated implementation dates (October 31, 1979, for identification of remaining instruments, and December 31, 1979, for implementation of complete program) have not been reached. This item remains open.

(Open) Infraction (324-325/79-02-10): Appendix A, item E, failure to have or follow procedures for calibration of safety-related laboratory instrumentation. The citation addressed several related issues which were also addressed in the licensee's response. The licensee had issued a letter dated March 30, 1979, placing these instruments under Volume VIII of the POM; this letter was retracted in a letter (OQA-79-65, file 2510) dated April 23, 1979. The licensee further stated that these instruments would, in the future, be controlled under section 6 of the Corporate QA Manual; these instruments have been added to that Section. Two procedures were identified as missing; one for calibration of a pH meter, the other for calibration of a conductivity bridge. RC&T Procedure 1300, Revision 0 dated June 29, 1979, covers the standardization of pH meters and Procedure 1320, Revision 0 dated June 29, 1979, covers calibration of portable conductivity bridges. The complete review of laboratory instruments and implementation of a calibration program for those used in activities affecting quality was not scheduled for completion until December 31, 1979; progress was being made and the item will be inspected after the commitment date. The licensee's response letter also included a statement that Section 13 of the CP&L Radiation Control and Protection Manual would be deleted; the licensee has decided to retain this Section for nonsafety-related items. The licensee will issue a supplementary response to clarify this commitment. Until the calibration program has been implemented for all laboratory instruments used in activities affecting quality, this item remains open.

(Open) Deficiency (324-325/79-02-11): Appendix A, item H, failure to have indication of calibration status on all safety-related instruments as required by the accepted QA Program. The licensee submitted a supplementary response for this item in a letter dated April 20, 1979 (OQA-79-73, file 2630(b)). The licensee was reviewed with respect to this supplemental response. The licensee took an additional exception to ANSI N45.2.8, Draft 3, Revision 3 to allow the use of external methods (status cards, computer printout) to indicate the status of calibration instead of calibration stickers on installed instruments. The letter stated that this method would be used unless notified as unacceptable by NRR. The remaining part of the supplemental response for this item stated that a list of affected instruments would be

1210-027

developed by June 30, 1979; with the exception of Environmental Technical Specification and Fire Protection instruments, that list was completed. The instruments were to be included in a calibration program by December 31, 1979; this aspect will be reviewed later. The identified instruments were contained in a memorandum (OQA-79-121, file 2630 (b)) dated May 29, 1979. This item remains open.

- b. Items (Open) Item (324-325/79-02-12): Inclusion of consumable/ expendable items on the CP&L "Q" List. Review was in progress, original completion date was scheduled for September 1, 1979. This item remains open.

(Closed) Item (324-325/79-02-13): Need to document current audit practices, five specific areas. QAAI-1, Revision 6 dated June 1, 1979, covered 3 of the 5 areas (need for detailed information, page 4; handling of field notes, page 7; handling of items previously identified by the audited organization, page 4). QAAP-1, Revision 7 dated June 1, 1979, covered the remaining 2 areas (handling of items requiring immediate correction, item 6.3.6.6; handling of overdue responses, item 6.5.1). This item is closed.

(Closed) Item (324-325/79-02-14): Need to complete initiated action to document pre-audit conference attendees. QAAP-1, Revision 6 dated June 1, 1979, requires the documentation of attendees at the pre-audit conference (page 5, item D.1). The inspector reviewed two recent audit reports and found that pre-audit attendees were documented. This item is closed.

(Closed) Item (324-325/79-02-15): Need to complete annual review of all plant operating manuals. This item was not cited since Operations QA had identified this inadequacy during audit QQAS-78-10 dated November 1, 1978. The required reviews were completed, OQA closed the item on January 22, 1979. The inspector also reviewed the POM on a sampling basis and found that the required reviews had been conducted. This item is closed.

(Closed) Item (324-325/79-02-16): Need to establish a method for transferring plant surveillance identified items to construction from operations. Procedure Joint QAI-1, "Transmitting of Deficiencies for Resolution", Revision 0 dated February 28, 1979, provided the needed methods. This item is closed.

(Closed) Item (324-325/79-02-17): Need to establish a method to control items which need rework or repair to replace the current use of Surveillance Reports. A procedure, QAP-10, "Method of Documenting Removal of Equipment for Repairs", Revision 0 dated February 28, 1979, defines a method. The inspector reviewed the Nonconforming Equipment Form (NEF) log. This item is closed.

(Open) Item (324-325/79-02-18): Need for timeliness of corrective actions and responses. The licensee had written a Procedure QAP-2, Revision 6, dated June 15, 1979. As a result of this revision, the inspector found that responses were now being received. However, the procedure does not require that the response identify a date for completion of corrective action. This identification was being required (by the direction of the QA Supervisor, above the written requirements of the procedure) on recent (since July 1, 1979) surveillance reports. However, since escalation actions are keyed to overdue commitments, this lack of commitment dates precludes procedural requirements for escalation. The licensee stated that the procedure will be revised by August 31, 1979, to require that the cause of the item found, the proposed corrective action, and a date for achieving full compliance be identified in the response. Until these additional provisions have been added to the procedure and backfitted to outstanding Surveillance Reports, this item remains open.

(Closed) Item (324-325/79-02-19): Need for escalation of corrective action to surveillance reports when auditor and the responsible organization disagree. The provisions have been made in QAP-2, Revision 6, item 5.6; to date, this process has not been used. For audits performed by OQA, procedure OQA-2, Revision 4 dated March 12, 1979, has an escalation process set forth in items 7.3 and 8.0. This item is closed.

(Open) Item (324-325/79-02-20): Need for a program for evaluation of repetitive failures. Although the original target date was August 1, 1979, the licensee had determined that the needed program would require additional time to properly generate. The target completion date was revised to be December 31, 1979. This item remains open.

(Closed) Item (324-325/79-02-21): Generate a procedure for receipt of Q material after normal working hours. SK-2, Revision 0 dated July 12, 1979 now provides for such receipt. This item is closed.

(Closed) Item (324-325/79-02-22): Document a requirement to followup orally or informally transmitted design information with a written document. Engineering Department procedure 3.1, Revision 15, requires (item 3.1.3.1) that when it is necessary to transmit design information informally, such information shall be confirmed in writing. This item is closed.

(Closed) Item (324-325/79-02-23): PNSC to review all modifications to determine if a proposed modification affects nuclear safety. ENP-3, Revision 6 dated February 9, 1979, paragraph 3.2.3 requires a determination to be made (and block 10 on the traveler appropriately checked) if a proposed modification could affect nuclear safety even when the modification itself is nonsafety-related. This item is closed.

(Open) Item (324-325/79-02-24): Update of drawings. This item was originally designated as 79-02-34 in Detail 9.c (page 20) of combined

reports 50-324/79-02, 50-325/79-02; this item should be designated 79-02-24. The licensee has addressed this item in two letters, one dated March 14, 1979, (GD-79-654, file 3513(B)) the other dated August 1, 1979, (GD-79-1967, file 3513 (B)). As indicated in these letters the licensee has identified those prints which will require revision. All completed plant modifications are to have their associated prints revised by September 14, 1979. This item remains open. The revision of System Descriptions is due December 31, 1979, as originally scheduled.

(Open) Item (324-325/79-02-25): PNSC to review all procedures required by Regulatory Guide 1.33, Appendix A. These were being reviewed, but the completion date of January 31, 1980, has not been reached. This item remains open.

(Closed) Item (324-325/79-02-26): Review use of revised AQAS-7 to assure reaudit of inactive vendors prior to being placed back on the active vendor list. The inspector discussed this item with the Principal Vendor Surveillance Specialist and reviewed the file for a recently revitalized vendor (Yarway). The system is operating as described in AQAS-7. This item is closed.