Florida Power
CORPORATION

March 24, 1976

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Nuclear Regulatory Commission
Region II, Suite 818
230 Peachtree Street, NW
Atlanta, GA 30303

Subject: 50-302/76-3

Dear Mr. Moseley:

In response to your Inspection Report No. 76-3 and pursuant to Section 2.201, NRC's Rules of Practice, Part 2, Title 10 Code of Federal Regulations, we wish to reply to the two enforcement matters specified therein. Subject is the two infractions concerning the filters and adsorbers for the various building ventilating systems. We will address each item as they were presented in Details II of the subject report.

Infraction No. 1

Contrary to 10 CFR 50, Appendix B, Criterion XIV, Inspection, Test and Operating Status, during the period January 20-22, 1976, the inspector observed in the environmentally controlled warehouse charcoal adsorbers that were not properly identified with respect to tests required by FSAR Table 9-15 and Requirements Outline-2948 as required by FSAR paragraphs 1.7.6.4.4 and 1.7.6.5.2 and Quality Program Procedure 14.10.

Details II - Paragraph 2:

(a) Paragraph 3:03.3.19 of the licensee's Requirements Outline-2948 specifies that the charcoal adsorbers used in the Reactor Building Purge System, the control complex emergency filter trains and the auxiliary building filter trains shall have removal performance for methyl iodide equal to previously demonstrated performance of two charcoals identified by manufactures designations and that the manufacturer shall present objective evidence to show that the filters offered can meet the requirement. Purchase Order File PR3-1921 containing the quality documents associated with Requirements Outline 2948 was reviewed by the inspector and the objective evidence specified above was not present. Consultations with management representatives verified that neither test results nor other objective evidence was supplied by the vendor and that no methyl iodide removal performance tests had been performed.

8003040 968

(a) Continued
Table 9-15 of the FSAR states "Specification requires that the manufacturer present evidence to show how the filter performance on iodine and methyl iodide was determined" in describing the "Degree of Compliance" of the Fuel Building (Auxiliary Building) and Control Building Systems for filtration and iodine adsorption with paragraph C.6 of Regulatory Guide 1.52.

(b) Paragraph 1.7.4 of the FSAR states that components and systems having a vital role in the protection against accidents or in mitigation of consequences of accidents are subjected to the Quality Program. The reactor containment building, the reactor auxiliary building, the control complex and Engineered Safeguards Systems are specifically given as examples of items subjected to the Quality Program.

(c) Paragraph 1.7.6.4.1 of the FSAR states that the requirements for the end product are set down in the design and procurement documents. Requirement Outlines are established as design and procurement documents with quality criteria by Quality Program Procedure 3.10 of the FPC Quality Manual in response to Quality Program Policy 3.1 of the FPC Quality Manual. The stated purpose of Quality Program Policy 3.1 is to establish design control with 10 CFR 50, Appendix B, Criterion III and the FSAR as bases for such control.

(d) Paragraph 1.7.6.4.4 of the FSAR requires "Quality Surveillance" to assure the Quality Program functions properly to produce an end product which conforms to the design documents and the quality requirements. Paragraph 1.7.6.5.2 requires that work affecting quality be done in accordance with detailed written procedures for quality control reporting and inspection status and control of material identification. Material and installation compliance status control is required by Quality Program Procedure 14.10 of the FPC Quality Manual in response to Quality Program Policy 14.1 of the FPC Quality Manual. The stated purpose of Quality Program Policy 14.1 is to establish the requirement for use of inspection, test and operating status indicators to prevent inadvertent installation or use of materials, components, parts, or equipment with 10 CFR 50, Appendix B, Criterion XIV as a basis for such indicators.

Response:

We have reviewed our documentation files and our review indicates that all documentation required by FSAR Table 9-15 and RO-2948 is on file.

The requirements of FSAR Table 9-15 which indicates the DEGREE of compliance to Reg. Guide 1.52, but not necessarily all conclusive compliance to Reg. Guide 1.52, and RO-2948 requires that the manufacturer's present objective evidence that the charcoal filter have removal performance of iodine and methyl iodide. This is presented by a certification by Barneby/Cheney that tests were administered in accordance with NSIC-4040

Response: (Cont'd)
on this type carbon by Barneby/Cheney, which at the time our Purchase Order and Requirement Outline was issued, met all NRC requirements. We have subsequently received a letter from the manufacturer confirming that these certifications were previously presented and accepted as the "objective evidence" required by our Requirement Outline, and further relating that the test results are available for further review upon request.

FPC feels that the above does satisfy all requirements of its commitment regarding this documentation. We have however, decided that in the interest of obtaining current data as a baseline for on going testing of the charcoal required by CR#3 Technical Specification, we have commissioned the manufacturer to run the required tests of a single sample composed of individual samples from the 11 lots of charcoal used in our filters. The manufacturer has advised us that he does have on hand small quantities of the batches of material used for our contract.

Details II - Paragraph 2:

(e) Review of Purchase Order File PR3-1921 by the inspector and consultation with management representatives revealed that the charcoal adsorbers had been released for installation without testing specified by the Requirements Outline and FSAR as a result of inadequate inspection and status indicators. This condition could have resulted in the installation of material not conforming to design and procurement documents. The above conditions, in apparent noncompliance with 10 CFR 50, Appendix B, Criterion XIV, were acknowledged by management. Management indicated appropriate corrective action would be taken.

Response:

Although the filters are not under hold, present procedures preclude their installation until the arrival of the supplier's representative, under who's direction the following activities will take place. The HEPA filters will be subject to a cold DOP test individually, prior to installation. HEPA filters will be installed and subjected to a total DOP test of the filters and housing prior to installation and check out of the Charcoal Filters. Charcoal Filters will be received and checked out prior to installation. Charcoal Filters will be checked for integrity of the filter itself as well as the proper density of the charcoal itself. Then the charcoal filters will be installed, and the charcoal filters and housing be subjected to an R-112 test.

We will verify that virtually all welding and painting will be done in the areas of the air stream that will flow through these filters in order to prevent clogging of these HEPA filters.

Infraction No. 2

Contrary to 10 CFR 50, Appendix B, Criterion XIII, Handling, Storage and Shipping, during the period January 21-22, 1976, the inspector observed charcoal adsorbers and HEPA filters in the coal yard warehouse that were not handled and stored in accordance with an approved vendor instruction or inspected to verify quality during storage as required by paragraph 1.7.6.5.2 of the FSAR and Quality Program Procedure No. 13.10.

Details II - Paragraph 3:

(a) The inspector observed that charcoal adsorber units for the auxiliary building filter trains, the reactor building (containment) purge filter trains and the control complex filter trains were stacked twelve units high in storage. Each adsorber unit weighs in excess of sixty pounds (FSAR, Table 9-12). This condition could result in deformation of the lower adsorbers due to excessive weight. Deformation of the adsorbers could impair their ability to perform safety related functions (FSAR, Sections 6 and 9). Observations were made on January 21, 1976.

(b) HEPA filter storage in a coal yard warehouse was observed on January 22, 1976. Some of the HEPA filters were stacked four units high contrary to accepted practice (ORNL-NSIC-65, Appendix C) in the absence of vendor recommendations. One pallet of filters, ten units, had been exposed to the weather as evidenced by water damaged packing cartons. Several filter cartons marked fragile had physical damage as evidenced by crushed corners on the cartons. Purchase Order File PR3-1921 and vendor manuals were reviewed by the inspector and management representatives were consulted to locate vendor handling and storage recommendations. No handling or storage recommendations from the vendor were located and a management representative indicated no recommendations had been received from the vendor.

(c) A management representative, accompanied by the inspector, contacted several warehouse and receiving personnel in an attempt to identify the storage location of the HEPA filters. Warehouse and receiving records were consulted by the personnel contacted but the storage location could not be firmly identified and none of the personnel could remember where the filters were stored. Over a two day period, January 21-22, 1976, of contacting various site personnel and looking in various warehouses, the management representative, accompanied by the inspector, located the HEPA filters in a coal yard warehouse as a result of the search effort.

(e) The above conditions are contrary to Procedure No. FPC-W8, Warehouse Functions, which requires in-door storage for ventilation system equipment and handling of materials in accordance with markings on crates or boxes and to Quality Program Procedure QP No. 13.10 requiring protection of equipment from the environment and elements and regular quality surveillance to assure that original quality requirements are maintained. Not adhering to the above procedures is contrary to Quality Program Policy No. 13.1 which references 10 CFR 50, Appendix B, Criterion XIII as a basis for the policy and to FSAR paragraph 1.7.6.5.2 requiring that work affecting quality be conducted in accordance with detailed written procedures for inspection, handling and storage of materials, components or systems.

(f) Paragraph 1.7.4 of the FSAR states that components and systems having a vital role in the protection against accidents or in mitigation of consequences of accidents are subjected to the Quality Program. The reactor containment building, the reactor auxiliary building, the control complex and Engineered Safeguards Systems are specifically given as examples of items subjected to the Quality Program. The above conditions, in apparent noncompliance with 10 CFR 50, Appendix B, Criterion XIII, were acknowledged by management. Management indicated appropriate corrective action would be taken.

Response:

A check was made of all cells of the subject carbon filters, no apparent damage was noticed. Subsequently, all charcoal filters have been placed on pallet racks individually and all HEPA filters have been placed in the environmentally controlled warehouse. This was started immediately after your inspection and accomplished on March 10, 1976.

While water damage was noted, the cartons were inspected for internal damage and none could be noted, however; these units will be subjected to a rigid receiving and pre-installation test prior to the final test which will prove the integrity of the unit as well as the housing.

At the time of issuance of the Requirement Outline, no other requirements were delineated and Reg. Guide 1.52 had not been issued and therefore, ORNL-NSIC-65 was not available for guidance.

This Purchase Order saw many shipments against it and therefore, during the NRC inspection, all receiving tickets should have been checked to verify the location. Subsequently, in checking these receiving tickets, noted on those tickets is the location of storage for each shipment. The receiving ticket did note storage of some HEPA filters in the Coal Yard Warehouse.

Response: (Continued)

As noted previously, all Charcoal and HEPA filters are now stored in the environmentally controlled warehouse as of March 10, 1976.

NOTE: Regarding the actual wording in the infraction, we wish to point out that there were no "Charcoal Adsorbers" stored in the Coal Yard Warehouse. The only items stored there were HEPA filters.

We believe that the above response indicates the necessary actions to be taken by FPC to correct the subject nonconformances detailed in the report. At this time, the actual date of the detailed inspection of the filters for final verification of their condition, has not been determined.

If you require any further information concerning these matters, please advise us.

Very truly yours,

J. T. Rodgers

J. T. Rodgers
Assistant Vice President

JTR:ldh

cc: J. Alberdi
M. H. Kleinman