



Carolina Power & Light Company

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April 21, 1982

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

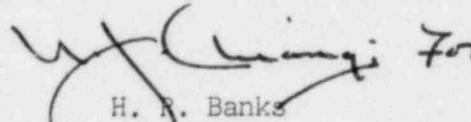
Dear Mr. O'Reilly:

In reference to your letter of March 22, 1982, referring to RII:
GFM 50-400/401/82-05, the attached is Carolina Power & Light Company's
reply to the deficiencies identified in Appendix A.

It is considered that the corrective and preventive actions taken will
be satisfactory for resolution of these items, once completed.

Thank you for your consideration in this matter.

Yours very truly,


H. R. Banks
Manager
Corporate Quality Assurance

NJC:jp

Attachment

cc: Mr. J. A. Jones

Sworn to and subscribed before me
this 21st day of April, 1982.


Notary Public

My commission expires:

12/7/86
Date

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Severity Level Violations

- A. 10 CFR 50, Appendix B, Criterion XV as implemented by CP&L PSAR section 1.8.5.15; CP&L Corporate QA Program section 15.1.3, require that nonconforming conditions be identified and corrected.

Contrary to the above, on January 28 and February 1, 1982, numerous nonconforming welded conditions were found in class IE Emergency switchgear cabinets that had not been identified previously by CP&L or the material vendor. Vendor welds were found to be missing, not of the required lengths or not spaced within the intervals prescribed in the vendor design drawings. The nonconforming welds were identified in cubicle number 4 of switchgear 1A-SA, pieces numbered 638, 626, 633, 663, 669, 690, 2, 4, 5, and 8 as designated on the detail shop drawings. This is a repeat violation.

- B. 10CFR 50, Appendix B, Criterion XIII as implemented by PSAR section 1.8.5.13; CP&L Corporate QA Program, section 5.4.1.f and construction procedures AP-XIII-07 (PGD-002) and WP-106 section 4.8 require that safety-related equipment be protected from the environment and adjacent construction activities and be maintained in accordance with the engineers' instructions and/or the manufacturer's recommendations.

Contrary to the above:

1. On February 2, 1982 three ASME section 3 valves were found not to be protected from adjacent construction activities which included sandblasting. Also, an installed fire protection valve (8FP-V65-1-4) was found to have its bonnet bent approximately 10 degrees off the horizontal. This is a repeat violation.
2. On February 9, 1982, storage practices on the fuel handling building cranes (150 ton, 50 ton and 12 ton) were found not to be in accordance with approved procedures or instructions, in that no instructions (maintenance logs) for the 12 ton crane existed; the maintenance logs for the 150 and 50 ton cranes were incomplete; the brake hoists were not covered to prevent deterioration; and there were numerous instances where electrical wiring was not properly protected from the environment.

Denial or Admission and Reasons for Violation:

- A. The violation is correct as stated. The switchgear in question was shipped by the Vendor with an Ebasco Quality Release for Shipment (QR), indicating the items and documentation had been reviewed at the source and that no deviations from the purchase contract were detected. When received with Ebasco QR's, items are normally receipt inspected only to the extent necessary to detect shipping damage and verify identification, exterior cleanness and integrity of any required protective covers and seals.

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- B.1. The violation is correct as stated. Craft personnel failed to maintain valves at storage levels outlined in procedure AP-XIII-05. Area superintendents failed to establish approved storage areas. The cause of damage to the valve is unknown.
- B.2. The violation is correct as stated. The failure to incorporate the 12 ton crane in the maintenance program was due to oversight. The Maintenance Logs failed to indicate a requirement to megger the eddy current brake on the 150 ton crane. The required maintenance was not clearly stated on the Maintenance Logs but was clearly stated on the maintenance instruction sheet (Equipment In-Storage Maintenance Sheet). This sheet was readily available to the field personnel performing the work. The brake hoists were not covered to prevent deterioration in the manner described by the vendor and on the instruction sheet because a decision was made to protect them with paint rather than polyethylene and desiccant. The decision is considered correct, but it was not properly documented. The electrical wiring was not properly protected because the polyethylene covering weathered and was not replaced.

Corrective Steps Taken and Results Achieved:

- A. Deficiency and Disposition Report (DDR) number 827 was issued on March 3, 1982, addressing shop welding not being in accordance with applicable shop drawings. Additional information, based on inspections by site welding inspectors, has been added to the DDR concerning welds not meeting Siemens-Allis weld inspection acceptance criteria.

CP&L and Siemens-Allis have inspected the prototype test units and documented the as-welded conditions on a brace by brace basis. This activity was completed on April 16, 1982. On April 19, 1982, CP&L and Siemens-Allis commenced an inspection of the switchgear cabinets on-site to identify and mark weldments which are not equivalent to or superior to the corresponding weldments found in the prototype. Deficient welds will be reworked to meet the dimensions of the prototype weld and the quality requirements of the Siemens-Allis welding acceptance standards. This will be verified by re-inspection. Completion of work and inspection is expected by May 31, 1982.

- B.1. The valves were restored to the appropriate storage levels and areas. Deficiency Report (DR) M-238 was issued to control resolution of the damaged valve. The valve was removed from the system and will be repaired or replaced by May 1, 1982.

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B.2. A Maintenance Log and instruction sheet have been prepared for the 12 ton crane. The Maintenance Log for the 150 ton crane has been changed to include the requirement to megger the eddy current brake. Equipment instruction sheets are now attached to the Maintenance Logs. A review of these logs and questioning personnel indicate that the instructions are understood. Field Change Request (FCR) M-513 has been submitted requesting to delete the requirement for a polyethylene cover and desiccant for the brake drums. Because an inspection showed the drums to be in good shape the polyethylene and desiccant will not be used while waiting for a response to the FCR. The vendor verbally agreed to the proposed protection and maintenance. The deteriorated polyethylene was removed from the wiring, the wiring was allowed to dry in the sun, acceptable megger readings were obtained and new polyethylene was applied.

Corrective Steps Taken to Avoid Further Noncompliance:

- A. In order to minimize future occurrences where items not meeting procurement document requirements are released to the field, the site QA/QC Unit has implemented an expanded receipt inspection program for items received with Ebasco or Westinghouse quality releases. These inspections are based on a statistical sampling and are performed in accordance with the approved receipt inspection procedure. Characteristics verified during these inspections include the following as appropriate: physical properties, dimensions, weld preparations, welding, general workmanship, lubricants and electrical insulation. This type of inspection will continue on items from a given vendor until a reasonably high level of confidence is gained, at which time inspections may be reduced to the extent formerly required for items received with quality releases.
- B.1. On March 9, 1982, CP&L responded to the previous violation in this area that was identified in the NRC report GFM 50-400/401/82-02. As stated in that response, classroom training for crafts and engineers in the storage and maintenance program was completed on March 3, 1982. Other actions taken were:
1. Reaffirming management concerns through emphasis to all supervisory levels of the job to comply with project housekeeping and storage requirements.
 2. Conducting surveys of equipment with high vulnerability to construction damage and fabrication of special enclosures if required.
 3. Assignment to construction housekeeping inspectors the additional responsibility of monitoring storage conditions.
 4. Assignment of safety proctors with additional responsibility of monitoring rigging off permanent plant equipment.
 5. Installation of locks on large equipment items, where practical, to reduce unauthorized access to the item's interior.

The above actions are in various stages of implementation to correct the previous violation and, therefore, apply to current violation as well. Significant improvements have been, and are continuing to be made as a result of these actions. These continuing actions are considered to be adequate for both the earlier and current violations.

- B.2. The Resident Engineering Unit is performing a complete review of maintenance requirements. This review requires a comparison of purchase order requirements and PSAR commitments with maintenance procedures and maintenance logs. Any discrepancies identified are being reviewed and evaluated for corrective action. This review is in two parts. First, it is documented that all of the requirements were reviewed. Secondly, all discrepancies and recommended actions are submitted to the appropriate engineering supervisor(s) for approval.

Date When Full Compliance Will Be Achieved:

- A. Full compliance will be achieved by May 31, 1982.
- B.1. Full compliance will be achieved by May 1, 1982 (see page 2, B.1.).
- B.2. Full compliance will be achieved by June 30, 1982.