CP&L

Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562

September 2, 1982

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 3100)
Atlanta, Georgia 30303

NRC-5

Dear Mr. O'Reilly:

In reference to your letter of July 7, 1982, referring to RII: GFM 50-401/82-24, the attached is Carolina Power & Light Company's reply to the violation identified in Appendix A.

It is considered that the corrective and preventive actions taken when fully implemented will be satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Yours very truly,

R. M. Parsons
Project General Manager
Shearon Harris Nuclear Power Plant

RMP/sh

Attachment

cc: Mr. E. A. Licitra (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)

Attachment to CP&L Letter of Response to NRC Report RII: GFM 50-401/82-24

Reported Violation:

10 CFR 50, Appendix B, Criterion XV as implemented by PSAR section 1.8.5.15, CP&L's Corporate QA Program section 5 and construction procedure CQC-2 require that nonconforming conditions be identified and corrected.

Contrary to the above, on June 30, 1982, two field welds on class IE electrical cable tray supports, that had been previously inspected by CP&L QC, were found to be nonconforming, and had not been documented as such, or corrected; in that one of the field welded joints on hanger item identified as 143G10, located in the reactor auxiliary building at elevation 261', was found to be undersized, and also at the same elevation, a fillet weld on hanger number ED2622 was found to be undersized. See the report details for further information on this matter.

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The inspector who performed the inspection is no longer with CP&L. To provide a reason as to why the welds were deficient would only be theory; however, it is assumed that he inadvertently overlooked the two welds referenced in the violation.

Corrective Steps Taken and Result Achieved:

Hanger ED 2622 and hanger item 1436-10 were reinspected and the deficiencies identified. Repairs of these items have been completed; however, engineering evaluation indicated that neither of the two supports would have failed if left "as-is". Random samples of nine (9) HVAC/cable tray supports previously inspected by the inspector in question were reinspected. Results of this reinspection revealed that out of a total of seventy-nine (79) welds, two (2) welds were found to be deficient. One was 1/16" undersize, the other had 1/16" to 3/32" of undercut. These two welds are being evaluated by engineering. In addition, previous deficiency and disposition reports (DDR) were reviewed against weld data reports (WDR) to see if any of these applied to the inspector in question. Two (2) DDR's, 828 and 978 did apply. The welding problems identified with these documents include slag inclusion, hanger only tack welded but signed off as inspected (thought to be an oversight), arc strike, fit-up gap of 5/32" undersize weld, and base metal reduction. As a result of our reinspection and review of DDR's, further sampling and reinspection will be performed until we are confident that the deficiencies identified on the inspector in question are errors and not a result of incompetency or failure to inspect. To date, with the information that has been obtained, we do not think we can make a determination. This is the reason for increasing the sampling size.

Corrective Action Taken to Avoid Further Noncompliance:

New inspector candidates under training in the QC welding unit must pass a written inspection prior to certification. In addition, the new candidates are to be interviewed by the QA/QC specialist and the QC welding supervisor to ensure they are aware of project requirements pertinent to their assignments.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by November 5, 1982.