

NRC REGION II
OFFICE: ATLANTA



Carolina Power & Light Company

NOV 2 10 00 AM '82
P. O. Box 101, New Hill, N. C. 27562
October 27, 1982

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

NRC-17

Dear Mr. O'Reilly:

In reference to your letter of September 28, 1982, referring to RII: MDH 50-400/82-31, the attached is Carolina Power and Light Company's reply to the violation identified in Appendix A.

It is considered that the corrective and preventive actions taken are 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. P. Kadambi (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)

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PDR ADDCK 05000400
Q PDR

Reported Violation:

10 CFR 50, Appendix B, Criterion V, as implemented by Carolina Power and Light PSAR Section 1.8.5.5, requires in part that activities affecting quality shall be prescribed by documented instructions, procedures or drawings and shall be accomplished in accordance with these instructions, procedures or drawings. Shearon Harris construction procedures AP XIII-07, Revision 15, Instorage Inspection and Maintenance, Appendix A, states that: "The entire process from receipt of an item to its incorporation in the maintenance program should take no longer than twenty-eight days."

Contrary to the above, eight electrical penetrations received June 15, 1982, five received June 30, 1982, and eight received July 26, 1982, had been stored with no provisions or instructions for checking the dry gas blanket pressure for each unit.

This is a Severity Level V Violation (Supplement II).

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The penetrations were not entered into the maintenance program within the required 28-day limit because of failure of the warehouse unit to notify the Mechanical unit upon arrival of the penetrations. The nitrogen gas warning tags attached to the shipping crates were located on one side of the crates only, and were not familiar tags to warehouse personnel. "Nitrogen gas - limited quantity - highly flammable" were the words printed on the tags. Also, the Mechanical unit did not adequately instruct warehouse personnel before arrival that maintenance would be required. Prior review of the purchase specification revealed only storage and not maintenance requirements. In addition, no vendor manual was available; therefore, the Mechanical unit did not investigate further.

Corrective Steps Taken and Result Achieved:

Warehouse maintenance logs have been initiated for all of the electrical penetrations according to vendor instructions (Westinghouse). One penetration (S/N 820603) was found lacking a nitrogen purge. The purge was restored and the penetration was meggered to check for internal moisture on October 8, 1982. All megger readings taken on the penetration exceeded 100 megohms, the minimum acceptable resistance reading according to the vendor. The quality characteristics of the penetrations exist.

In addition, experienced site supervisors (Mechanical, Electrical, and Warehousing) performed a walkdown of storage areas on September 11, 1982. This walkdown was to identify and correct similar deficiencies. The walkdown revealed seven additional storage discrepancies for which corrective action was taken.

Attachment (cont'd.)

Corrective Action Taken to Avoid Further Noncompliance:

The Warehouse unit was notified by the Mechanical unit that future deliveries of electrical penetrations will require initiation of warehouse maintenance logs. Also, a daily log sheet of equipment received on site is being sent from the warehouse to the Mechanical equipment unit as a double check of equipment received.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 25, 1982.