CP&L
Carolina Power & Light Company
P. O. Box 101, New Hill, N. C. 27562
September 2, 1983

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30303

NRC-111

Dear Mr. O'Reilly:

In reference to your letter of August 3, 1983, referring to RII: GFM/RLP 50-400/83-22-02, the attached is Carolina Power and Light Company's reply to the violation identified in Appendix A.

It is considered that the corrective action taken is 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: Messrs. G. Maxwell/R. Prevatte (NRC-SHNPP)
Mr. B. C. Buckley (NRC)

REPORTED VIOLATION:

10 CFR 50, Appendix B, Criterion V as implemented by CP&L Corporate QA Program Section 6.2.5, requires that Deficiency Reports, Deficiency and Disposition Reports, and Nonconformance Reports be controlled in accordance with procedural requirements.

Contrary to the above, on June 29, 1983, an inspection revealed that nonconformance reports are not being documented and processed in accordance with applicable procedures.

For ease of response, the violation has been subdivided as outlined below for QA/QC and NPCD portions. Response to each is provided under each heading.

QA/QC Violations (as referenced in report):

1. Multiple instances of unauthorized personnel signing disposition acceptance on DDR's and NCR's were observed. One instance was noted in which a DDR was initiated, reviewed, dispositioned, reinspected and accepted by the same QC inspector.

2. Site QA failed to review all DR's for acceptance of disposition, and to review for the reportability requirements of Part 21 and 10CFR50.55(e).

3. DDR's are not being issued in accordance with the time requirements of CQC-2, which is four days; this is a result of inspection personnel not being able to obtain DDR tracking numbers.

Construction Inspection Violation (as referenced in report):

1. Multiple instances of unauthorized personnel signing disposition acceptance on DR's were observed.

DENIAL OR ADMISSION AND REASON FOR THE VIOLATION:

QA/QC Violations:

1. The violation is correct as stated. The lead technician referenced was designated to fulfill the technical duties of the QA/QC Specialist in his absence. Since the technician had been designated, he assumed it was acceptable to sign for the Specialist to expedite processing of DDR's and NCR's. Review of approximately 150 closed DDR's indicate that other lead technicians have made similar assumptions.

2. The violation is correct as stated. QA personnel had reviewed DR's for reportability and disposition acceptability although in all cases documented evidence (i.e., initials and dates) was not shown to indicate a QA Specialist's review.

3. The violation is correct as stated. DDR's and NCR's were being initially reviewed by Supervisors to determine if a nonconformance actually existed before a number was assigned. DDR's 1684 and 1685 listed in the NRC report (as examples) were scrutinized to verify that nonconformances existed and to ensure that the nonconforming conditions were correctly and accurately stated. Several DDR's have been issued when, in fact, no nonconformance existed or the conditions were not as stated in the report. To prevent this, the supervisors were instructed to review

DDR's and NCR's to the extent necessary to minimize the number of invalid nonconformance reports entering the system. In performing these reviews, supervisors, on a few occasions, failed to comply with the procedure in respect to timely issue of nonconformance reports.

Construction Inspection Violation:

1. The violation is correct as stated with clarification. The details of the NRC Inspector's report cited "unauthorized personnel signing disposition acceptance on ..... DR's." For the DR's in question, the corrective action and resolution details (response) were not signed by the designated authority (Principal Discipline Engineer). The resolution verification and acceptance ("disposition acceptance") sign-offs were by authorized Construction Inspection personnel.

   The DR responses were developed by the "unauthorized personnel" and submitted directly to Construction Inspection. The close-out review failed to detect that the DR response did not include the sign-off of the Principal Discipline Engineer.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

QA/QC Violations:

1. Approximately 150 closed DDR's have been reviewed by the Superintendent - QC for deficiencies and acceptable issue and closure by the QA/QC Specialist. The review revealed 12 DDR's that had been either issued or closed by someone designated to sign for the QA/QC Specialist. In the 12 cases noted, the DDR had been reviewed by the QC Supervisor or the Superintendent - QC for technical adequacy prior to issue.

   All closed DDR's and NCR's will be reviewed to determine those closed without the review of corrective action by the proper level of QA/QC supervision. In any case where the corrective action is found not to be acceptable as determined by QA/QC Supervisors, the item will be reopened with the issue of a new NCR or DDR, as appropriate. All open DDR's and NCR's issued without review by the proper level of QA/QC supervision will be reviewed by the QA/QC Supervisor or the QA/QC Specialist to ensure correctness. Any errors will be corrected and the nonconformance reissued. The "blanket" memorandums designating Lead Technicians authorized to sign for the QA/QC Specialist have been rescinded. New memorandums designating technicians to perform technical responsibilities assigned to QA/QC Specialists have been issued. These memorandums specifically exclude the issuing and closing of nonconformances.

2. All open DR's have been re-reviewed by the appropriate QA Specialists. These reviews have been documented on the DR's with their respective initials and dates. Additionally, closed DR's on file in the QA Records vault received a technical review by QA personnel prior to filing.

   During this re-review, no conditions were encountered necessitating upgrading of the DR's to DDR's.

3. Immediate (July 1, 1983) training was held by the Director - QA/QC for all Unit supervisory personnel on review and issue of DDR's. A memorandum was issued to all Unit Supervisors on July 1, 1983 as a follow-up to the training session. Specifics of the training and memo were as follows:

a. After completing the draft of a nonconformance, an inspector is permitted to obtain a DDR number either through his supervision or by direct contact with the individual responsible for the DDR Log.

b. The inspector is to sign and date the DDR when he turns it over to his supervisor for review.

c. The supervisor is responsible for a timely and thorough review of the DDR to ensure accuracy and completeness prior to issue and forwarding to engineering for evaluation.

d. Paragraph 6.5 in Procedure CQC-2, Nonconformance Control, is to be followed without exception. Additionally, if during review the nonconformance is to be changed significantly, the changes are to be reviewed with the inspector to ensure he understands the rationale for the changes.

Construction Inspection Violation:

1. In the case of the DR's, no reworking of the closed-out reports are considered necessary due to the resolution details being found satisfactory to restore the items to approved project specifications or to meet an approved revision to the specifications. In addition, distribution of closed-out DR's are transmitted to the cognizant Principal Discipline Engineers and other management personnel through standard distribution.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER NONCOMPLIANCE:

QA/QC Violations:

1. QA/QC technicians are no longer authorized to sign for issue and closure of DDR's and NCR's. In the absence of the QA/QC specialist, the nonconformance is escalated to the QA/QC supervisor for issue and close-out.

2. Flow of DR's within QA has been streamlined to ensure that the appropriate QA individual reviews the DR's. After QA review, copies of the open DR's are maintained on file in the QA office.

3. Procedure CQC-2, Nonconformance Control is currently being revised to further clarify the responsibilities for review and issue of nonconformance reports. The training session and memorandum by the Director - QA/QC were intended to eliminate any misunderstandings related to the inspectors obtaining DDR numbers and the timely issue of DDR's.

Construction Inspection Violation:

1. The Principal Discipline Engineer in question has instructed the discipline personnel in the requirements for DR response sign-off. The Construction Inspection Unit Supervisor has issued a memo of instruction to remind the inspection personnel that existing procedures invoke DR response sign-off by the Principal Discipline Engineer.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

QA/QC Violations:

1. Review of DDR's and NCR's processed prior to this report will be completed by September 30, 1983.

2. DR review and/or evaluation is anticipated to be complete by November 4, 1983.

3. Full compliance was achieved on July 1, 1983.

Construction Inspection Violation:

1. Full compliance was achieved on August 23, 1983.