



Carolina Power & Light Company

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

Jan 13, 1984

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

NRC-165

Dear Mr. O'Reilly:

In reference to your letter of December 14, 1983, referring to RII: GFM/RLP 50-400/83-33, 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)

B402140417 B40130
PDR ADOCK 05000400
Q PDR

Attachment to CP&L Letter of Response to NRC Report RII: GFM/RLP 50-400/83-33

Reported Violation:

10 CFR 50, Appendix B, Criterion XVI, as implemented by PSAR Section 1.8.5.16, CP&L Corporate QA Program Section 15.2, requires significant conditions adverse to quality to be identified and corrective action taken to preclude recurrence.

Contrary to the above, on October 31, 1983, it was found that containment electrical penetrations were being installed without adequate inspection procedures and documentation. CP&L issued DDR 1916 to document the lack of adequate procedures for accomplishment of work and inspection on the installation of these penetrations. The disposition and corrective action taken on the DDR failed to provide adequate corrective action on previously inspected work.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

Containment electrical penetrations (outboard and inboard boxes and internal assembly) were being installed and inspected using WP-137 exhibits. No Construction Inspection technical procedure was available for documentation of inspections.

Under the Corrective Action and Preventive Measures for DDR-1916, the Preventive Measures addressed the utilization of WP-137 exhibits for installing containment electrical penetrations (outboard and inboard boxes, and internal assembly). No Corrective Action was proposed in the DDR-1916 to handle any previously inspected work.

Corrective Steps Taken and Results Achieved:

In order to document the installation and inspection of these electrical penetrations, specialized TP-28 exhibits were formulated for each individual penetration. These new inspection exhibits detail the necessary inspection points and allows for a complete documentation of each penetration installation. DR-E-320 was issued concerning the installation of previously inspected items prior to issuance of WP-137 installation travelers. In addressing this discrepancy, new TP-28 exhibits were completed for the previously inspected items. No reinspection was required because the inspection points on the new TP-28 exhibits accurately reflect the previous inspections actually performed at the time of installation. Several inspection hold points on the WP-137 exhibits were dated incorrectly (dates signed were when traveler was received by individuals, instead of when work was completed). These dates were corrected to show actual date when subject work was completed.

A sample of DDR's written within the last six months by the QAS subunit were reviewed for corrective and preventative measures. This review revealed no additional concerns; therefore, DDR-1916 is considered an isolated case.

Corrective Steps Taken to Avoid Further Noncompliance:

The new TP-28 exhibits that are issued for each penetration are reviewed by the appropriate Construction Inspector Supervisor and cognizant Discipline Engineer prior to initiation of work.

To preclude further violations of this nature, the QAS subunit will perform a more comprehensive review of nonconformances to ensure adequate corrective and preventative measures are taken prior to closure of nonconformances. Surveillance personnel have been instructed in the manner that this action is to be accomplished.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on January 11, 1984.