

CP&L

Carolina Power & Light Company

4 A10: 51

Company Correspondence

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

December 30, 1983

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

NRC-161

Dear Mr. O'Reilly:

In reference to your letter of December 6, 1983, referring to RII: ABR 50-400/83-31, 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)

8402280189 840210
PDR ADOCK 05000400
Q PDR

Attachment to CP&L Letter of Response to NRC Report RII: ABR 50-400/83-31

Reported Violation:

10 CFR 50, Appendix B, Criterion V as implemented by Carolina Power and Light Company PSAR, Section 1.8.5.5, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures and drawings. Procedure CQC-7, Marking and Tagging, establishes requirements and methods for marking and tagging items to provide identification and QA inspection status. QA tags are used and attached to an item in a QA hold status. The filled out tag specifies the reason for the QA hold and specifies additional remarks or instructions to appropriate personnel.

Contrary to the above, on November 9, 1983, safety-related cable reels were stored outdoors, while the instructions on the QA hold tag dated October 17, 1983, called for indoor storage.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The cable reels in question were sent from the site to a vendor to have cable cut to specific lengths and a connector attached. This purchase order was cancelled and the uncut cable was returned to the site. All of the cable is classified as power cable according to the Packing Lists included with the shipment. Such cable requires Level D storage per procedure. The cable was received and placed on QA hold pending inspection. When the QA Hold Tag was placed onto the cable reels, Level C storage was specified on the tag in error.

Corrective Steps Taken and Results Achieved:

All cable reels in question were stored properly in accordance with AP-XIII-05 (Material Storage). Q.A. personnel corrected the Hold Tags located on the cable reels so that the proper storage level (D) was specified.

Corrective Steps Taken to Avoid Further Noncompliance:

Storage levels are presently not specified on Q.A. Hold Tags. A revision was made to CQC-7 deleting the requirement for storage level specification on the tags. However, warehouse personnel have been instructed that should they observe during their normal work activities, QA Hold Tags or other identifying markings that conflict with procedures, they should bring the conflict to the appropriate individuals attention such that the conflict can be resolved. Presently, AP-XIII-05 does not list which cable groups are specified as instrumentation or power cable. However, the Material Packing Slip included with the shipment does specify the cable type, as does the Quality Release Tag. In addition, the purchase order specification breaks the cable down into specific B.M. (Bill of Materials) Numbers, so that if uncertainties with storage levels arise, the B.M. Numbers shown on the Packing Lists can be referenced by the specification, assuring proper storage level.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on December 1, 1983.