



Carolina Power & Light Company

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

July 26, 1984

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30323

NRC-244

Dear Mr. O'Reilly:

In reference to your letter of October 19, 1983, referring to RII: PRB 50-400/83-25-01, the attached is an update of Carolina Power and Light Company's position on the violation identified in Appendix A. This letter supersedes our November 18, 1983 and November 30, 1983 responses as they pertained to Violation 83-25-01.

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

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Reported Violation:

10 CFR 50, Appendix B, Criterion X, as implemented by the Carolina Power and Light PSAR Section 1.8.5.10, requires that inspection of activities affecting quality shall be executed to verify conformance with the documented instructions. Construction procedures TP-28 and WP-105 are the Harris site instructions that are used in the installation inspection of safety-related equipment.

Contrary to the above instructions, the installation inspection, which was performed for Motor Control Centers (MCCs) 1A35-SA and 1B35-SB was inadequate in its execution in that inspection failed to identify the following:

1. The MCC hold-down fasteners were not tightened.
2. The MCC elevation checks were not adequately performed.
3. The welding of the MCC mounting sill to embedded plates differed from the requirements on the vendor plan which was referenced on the welding instructions.

This is a Severity Level IV Violation (Supplement II), and is applicable to Unit 1 only.

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

1. The fasteners were loose because either they were not checked closely enough or they were loosened by others who may have performed work on the MCCs after the inspection by CI.
2. Elevations were checked indirectly by CI Inspector by verifying previous sign off of pad elevation by Civil CI when pad/embeds were installed.
3. The QC Structural Welding Inspector inspected the weldments in question as per the vendor drawing's minimum weld size 1/4" x 1/4" x 3". Using the 1A4 welding process and a 1/8" E-7018 electrode, an acceptable 1/4" fillet weld was not attained. Therefore, to reach the required weld size, multiple passes were performed. The QC Inspector should have requested clarification before performing the final inspection.

Corrective Steps Taken and Results Achieved:

1. An evaluation was performed to identify fasteners in MCCs under the scope of Regulatory Guide 1.29. They have been reinspected to ensure tightness under construction procedure TP-28. Discrepancies were noted and resolved.
2. Since there is no elevation specified by the vendor or Ebasco drawings for the MCC's, and the equipment pads were previously checked by Civil CI, an elevation check is not considered necessary. WP-105 and TP-28 have been revised to reflect this.
3. Motor Control Center mounting sill weldments were evaluated by Harris Plant Engineering Section and were found to be structurally sound. FCR-AS-3914 (approved October 27, 1983) was issued to allow for multiple weld passes to attain the required weld size.

Corrective Steps Taken to Avoid Further Noncompliance:

1. (a) Additional training of inspection personnel involved in inspection of MCCs was conducted by the lead inspector on October 28, 1983 emphasizing closer inspection of MCC fasteners for correct tightness under TP-28.
- (b) Exhibit 12, WP-105, is now being used to have CI check the results of work performed on equipment that has been disassembled. Exhibit 12, WP-105, is used for special assembly of equipment. This exhibit will be required to be initiated if equipment has to be disassembled to facilitate installation and has to be reassembled after installation.
2. Inspection personnel involved with inspection of MCCs received training by the lead inspector on October 28, 1983 on the requirements for elevation checks against vendor, Ebasco, or CP&L approved design documents.
3. QC structural welding inspection personnel have been instructed to follow applicable inspection criteria (i.e., FCR's, DCN's, PW's, Vendor and Engineering related drawings). If conflicts arise, inspectors will request clarification of information prior to performing inspection.

Date When Full Compliance Will Be Achieved:

1. Full compliance was achieved on January 31, 1984.
2. Full compliance was achieved on January 1, 1984.
3. Full compliance was achieved on October 28, 1983.