



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
161 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30323

NRC-245

Dear Mr. O'Reilly:

In reference to your letter of September 22, 1983, referring to RII: GFM/RLP 50-400/83-26-03, the attached is Carolina Power and Light Company's reply to the violation identified in Appendix A. This letter supersedes our October 21, 1983 response.

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)

8408280465 840810
PDR ADOCK 05000400
Q PDR

Attachment to CP&L Letter of Response to NRC Report RII: GFM RLP 50-400/83-26-03

Reported Violation:

10CFR 50, Appendix B, Criterion V, as implemented by CP&L PSAR Section 1.8.5.5 and CP&L Corporate QA Program Section 6.2.5, requires that activities affecting quality be accomplished in accordance with procedural requirements.

Contrary to the above, on August 16, 1983, a Class 1E electrical cable was being installed even though all of its applicable raceway installation discrepancies had not been resolved, as required by Construction Procedure WP-206.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

1. The clearance requirements between electrical raceways and mechanical piping identified in WP-203 allow for an engineering evaluation when they cannot be maintained. This interference was evaluated and FCR-P-1366 was written to reroute the pipe. CI was aware of the interference and the FCR. Therefore, further documentation was not required.
2. FCR-E-1192 R3 was issued which added the nipple entry into 1A3S-SA. The FCR was not incorporated into the CCL (Conduit and Cable List) at the time the pull card was issued. Verification of the completeness of the raceway was based on the pull card.
3. The engineer who released the pull card was under the impression that all raceways were accepted. This was based on a walkdown performed by the engineer. However, the engineer did not follow the procedure requirements when he failed to implement our normal check and verification method.

Corrective Steps Taken and Results Achieved:

1. Implementation of FCR-P-1366 rerouted the pipe and resolved the interference problem.
2. Based on FCR-E-1192 R3, an installation card for this nipple was issued to the field, inspected and accepted. A revised pull card was then issued to the field, installation completed, inspected and accepted.
3. Work procedure WP-206 (Documentation and Control of the Installation and Termination of Electric Cable) requires that raceways be inspected prior to pulling safety-related cable in a given raceway. Cable will not be authorized to be pulled in a given raceway which might have outstanding punch list items without a specific engineering evaluation.

Corrective Steps Taken to Avoid Further Noncompliance:

1. Not required.
2. HPES is expediting Ebaseco to incorporate FCR's and DCN's into the CCL in a timely manner. Also, with the aid of the site computerized CCS (Computer Control System), a more thorough FCR/DCN review is being performed prior to issuing the cable card. The CCS provides a FCR/DCN cross reference for each cable.
3. To assure compliance with the requirements of WP-206, our method of check and verification will be used.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 17, 1983.