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Carolina Power & Light Company

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Company Correspondence

P. O. Box 101, New Hill, N. C. 27562
July 25, 1984

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

NRC-242

Dear Mr. O'Reilly:

The following is an update on our progression concerning the violation identified in RII: GFM/RLP 50-400/83-29. This letter supercedes our June 1, 1984 response.

In our December 9, 1983 letter, NRC-152, we informed you of the actions we planned to take to resolve the referenced violation concerning non-"Q" class bolting material being used in a "Q" class application. ASME Code bolting, which has specific traceability requirements was not a concern and is not addressed here.

In our February 1, 1984 letter, NRC-177, we stated that our commitment to revise site specifications where necessary, to allow substitution of bolts which are marked as standard practice for those which are not already marked or easily identifiable by shape, manufacturers' mark, etc., had been met. We also stated that we had, subsequent to our initial response, identified instances where quantities of unmarked fasteners were being supplied by some vendors along with unassembled equipment or materials, and that we were devising methods for identifying these fasteners, also. In addition, we stated that investigation for acceptability of previously installed fasteners was in progress.

We have now established and implemented a system whereby these vendor-supplied fasteners are marked similarly to those site purchased directly. Unmarked "Q" bolts will no longer be issued to the field, except replacement bolts for those supplied with equipment, and for which there are no acceptable substitutes. These will be controlled through receipt inspection and issued in marked containers.

We are routing requisitions for fasteners through the Civil Resident Engineer to assure they are ordered as "Q" which will require them to go through a receipt inspection. We have issued a site administrative procedure governing identification of bolting material and feel that by controlling "Q" bolts, from purchase through installation and final acceptance, we can eliminate the requirement for ordering non-"Q" fasteners as "Q", also. In addition, we have determined there is no project requirement for a Certificate of Conformance for "commercial grade" Q materials such as bolts, only that they receive QC receipt inspection.

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Therefore, with the issue of our procedure, non-ASME Code bolting materials will be controlled as follows:

Requirements have been established to uniquely identify "Q" bolts as to material type and grade and/or other specified requirements and further, to require QC receipt inspection where identification will be verified.

"Non-Q" fasteners may be ordered "non-Q", but will still be received by QC receiving. Upon receipt, non-Q fasteners will be compared with the approved list of 'Q' fasteners. If they are similarly marked, they will receive the same QC receipt inspection required for 'Q' fasteners, and will be acceptable as 'Q'. If they are not marked similar to the 'Q' fasteners, they will be released to the warehouse for issue for non-Q use.

Until such time as we have gained confidence in our procedure, requisitions for fasteners will continue to be routed through the Civil Resident Engineer to ensure they are ordered as "Q" and receive a receipt inspection.

Investigation for acceptability of previously installed fasteners is continuing. To ensure acceptability of fasteners already installed, they are being inspected or verified prior to final system turnover to plant operations. Therefore, we project completion of the reinspection/verification to be March 31, 1985.

Thank you for your consideration in this matter.

Yours very truly,



R. M. Parsons
Project General Manager
Shearon Harris Nuclear Power Plant

RMP/pg

cc: Messrs. G. Maxwell/R. Prevatte (NRC-SHNPP)
Mr. B. C. Buckley (NRC)