



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

AUG 14 1984

Report No.: 50-400/84-22

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Docket No.: 50-400

License No.: CPPR-158

Facility Name: Harris Unit 1

Inspection Dates: July 16-20, 1984

Inspection at Harris site near Raleigh, North Carolina

Inspector: *C. M. Upright for* *8/9/84*
L. H. Jackson Date Signed

Approved by: *C. M. Upright* *8/9/84*
C. M. Upright, Section Chief Date Signed
Quality Assurance Branch
Division of Reactor Safety

SUMMARY

Scope: This routine unannounced inspection involved 34 inspector-hours on site in the areas of procurement, receiving, and storage; 10 CFR Part 21 requirements; and onsite design activities.

Results: Of the three areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

- *T. C. Bell, Construction Document Control Senior Specialist
- C. W. Chavis, Jr., Lead Receiving Inspector
- *N. J. Chiangi, Manager QA/QC Harris Plant
- A. Cockerill, Resident Electrical Engineer
- J. Disoway, Electrical Engineer
- *G. L. Forehand, Director QA/QC
- *P. F. Foscolo, Assistant General Plant Manager
- M. S. Gassman, Receiving Inspector
- *J. M. Given, Senior QA/QC Specialist
- T. Harrington, Purchasing Agent
- E. M. Harris, Principal Mechanical Engineer
- C. P. Irving, Receiving Inspector
- *B. Langlois, Construction Inspector Unit Supervisor
- *L. I. Loflin, Manager Engineering Harris Project
- *D. A. McGaw, Superintendent QA
- *R. M. Parsons, Project General Manager
- R. V. Pederson, Senior QA/QC Specialist
- *M. F. Thompson, Jr., Manager Engineering Management
- *H. F. Wagner, QA/QC Specialist
- *M. G. Wallace, Construction Specialist
- *R. A. Watson, VP Harris Nuclear Project
- *E. E. Willett, Resident Engineer Mechanical
- *C. K. Wright, Specialist Regulatory Compliance

Other licensee employees contacted included engineers, construction craftsmen, technicians, and office personnel.

NRC Resident Inspector

- *G. Maxwell, Senior Resident - Operations
- *R. Prevatte, Senior Resident - Construction

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on July 20, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings.

3. Licensee Action on Previous Inspection Findings

(Closed) Severity Level V Violation 400/83-25-04: Failure to Properly Store Records

The licensee responses dated November 4, 11, and 18, 1983, were considered acceptable by Region II. The inspector toured the construction and

permanent record storage vaults and confirmed that records are now being stored in accordance with CP&L procedure CQA-4, R5, QA Records. The inspector concluded that the licensee had determined the full extent of the violation, taken action to correct current conditions, and developed corrective actions stated in the licensee response have been implemented.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Procurement, Receiving, and Storage (35065)

a. Inspection Objective

This inspection was conducted to determine that procurement, receiving, and storage specified design parameters are in accordance with the architect-engineers specifications, identify applicable technical requirements, impose requirements of 10 CFR 21 for basic components, suppliers are on the approved list, Vendor's quality assurance programs have been approved by the licensee, certificates of conformance or certified material test reports are required, and that adequate protection, handling, and control of procurement documents were being implemented.

b. General

The safety-related equipment and materials received at the site are either NSSS supplied or CP&L procured from specifications prepared by Ebasco, the A-E, and reviewed and approved by CP&L. Site procurement is made from EBASCO and CP&L pre-approved specifications.

The inspector reviewed the following site purchase orders:

H53273A, Guyon Alloys, Harrison N. J. for SA312/376TP/304/316 stainless steel pipe.

H39013, ITT-Grinnell for Diaphragm Valves

H54183, Gould Incorporated for breaker type HE3B050

H51317, Wilmington Electric for Burndy connectors type YA-26U

c. Material Receiving and Storage

The inspector toured several of the warehouses to confirm that materials and equipment were being stored in accordance with the accepted QA program. Chapter 1.8 of CP&L PSAR endorses ANSI N45.2-1971, Quality Assurance Program Requirements for Nuclear Power Plants. The warehouse storage program appears to meet the intent of ANSI N45.2.2. The storage of equipment in the power block appears acceptable.

The inspector selected material purchased from Wilmington Electric on Purchase Order H51317 to confirm that the licensee required control of off-the-shelf items purchased for use in quality systems. The inspector with the assistance of a CP&L receiving inspector confirmed that Burndy connectors were marked in accordance with approved drawing SKD9756 R3, that the connectors were stamped and color coded in accordance with the approved drawing, that the material was being stored properly, and that QA had accepted the material for use based on it being relatively simple and standard in design and manufacture.

The inspector confirmed that purchase order H54183 required the breakers to be in accordance with approved specification E-10B R11, that the supplier have a QA program which meets 10 CFR 50 Appendix B and ANSI N45.2-1971, that CP&L required right of access for inspection, that the supplier was required to report items under 10 CFR Part 21, and the supplier was required to furnish a COC with the breakers.

The inspector confirmed that purchase order H53273A from Guyon alloys contained appropriate specifications, was reviewed and approved by site QA, required 10 CFR Part 21 requirements, access for inspection, required certified material tests reports and heat-treatment records, and the vendor is on the approved vendor list.

Within this area, no violations or deviations were identified.

6. 10 CFR Part 21 Inspection (36100)

a. Inspection Objective

This inspection was performed to determine whether organizations and individuals subject to 10 CFR Part 21 regulations have established and are implementing procedures and controls to assure the reporting of defects and noncompliances.

b. Inspection Requirements

The inspector reviewed the following:

Corporate QA Program
Section 15, Nonconformance Control and Corrective Action, R6

Nuclear Engineering and Licensing Department
3.11, Handling of Reportable Items Under 10 CFR 21, R11
3.12, Procedure for Evaluating Deficiencies in accordance with
10 CFR 50.55(e), R14

Harris Plant Engineering Section
3.4, Processing and Control of Nonconformances, R3
CQA-3, Nonconformance Control, R3

This review verified that:

- procedures require posting of 10 CFR Part 21
- measures are established for evaluating deviations
- measures are established to require vendors to report 10 CFR Part 21 deviations
- procedures require responsible officers to be notified of defects or failure to comply
- procedures designate the responsible officer to inform the Commission of a defect or reportable failure to comply
- procedures require procurement documents to specify that provisions of 10 CFR Part 21 apply
- procedures require maintenance of records concerning 10 CFR Part 21
- procedure require preparation and appropriate disposition of records

c. Implementation

The inspector verified that 10 CFR Part 21 was posted in the engineering office on the bulletin board and in the conference room. The inspector selected two deviations which were not reported to NRC and verified that:

- the item was identified and evaluated in accordance with established procedures
- the information appeared to be factual and complete
- the deviation could not have caused a substantial safety hazard
- the documentation indicated that a proper evaluation had been performed

The inspector also selected NCR 84-0782 and NCR 84-0647 which have been reported to NRC and confirmed that:

- pertinent information relative to the nonconformances had been supplied to the QA group responsible for evaluating reportability under 10 CFR Part 21
- evaluation of these NCRs are still in progress

Within this area, no violations or deviations were identified.

7. Onsite Design Activities (37055)

a. Inspection Objective

This inspection was conducted to determine whether the licensee's onsite design activities, including controls for architect engineering

design change notices, is conducted in compliance with the technical and quality assurance requirements described in Chapter 17.2.4 of Harris FSAR.

b. General

The inspector reviewed Harris Plant Engineering Section (HPES) manual 3.1, Processing and Control of DCNs, and verified that DCNs initiated by EBASCO cannot be issued to construction for implementation until approved by HPES. DCNs are the mechanism used by Ebasco to revise drawings, design documents, or specifications. The original documents are later revised to incorporate the DCN.

CP&L approval or rejection of DCNs thereby controls the change process. Once CP&L has approved the DCN, it is issued to construction for implementation. After implementation and final QA/QC acceptance of the completed item, the DCN is closed and a completed copy forwarded to Ebasco. This chain of events is used to update the as-built drawings and account for incomplete and complete work activities.

c. Implementation

The inspector reviewed DCN-530-1140 which was rejected for implementation by HPES because the piping defined in this DCN was in conflict with DCN-FD-905. DCN-530-1140, R1, received conditional approval by CP&L. This DCN added essential service water pump and bearing water booster pump piping. The conditional approval eliminated Unit 2 piping from the drawing.

The inspector verified that DCN-530-1140-R1 was properly controlled, reviewed, approved, and distributed to appropriate personnel.

Within this area, no violations or deviations were identified.

8. Inspector Followup Items (IFIs) (92701B)

(Closed) IFI 400, 401/83-25-12: Potential for Inadequate QC Inspection. The inspector verified that the Construction Inspection (CI) group has been positioned directly under the Project General Manager as of October 10, 1983, thereby eliminating the CI group from reporting to engineering. This change allows more freedom for independent QC inspections.

(Closed) IFI 400, 401/83-25-14: Multiple Formats for Identification of Similar Problems. The inspector confirmed that CP&L procedure CQA-3, R3, has been issued to require a single NCR form for the Harris project. All disciplines must therefore report nonconformances on the same form.

(Closed) IFI 400, 401/83-25-16: Potential for Loss of Records. Emphasis has been placed on records control. The project now issues work packages which are required to be turned in at the end of each shift. This practice should provide better control of quality records.