

CP&L

Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
August 15, 1984

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

NRC-248

Dear Mr. O'Reilly:

In reference to your letter of May 19, 1983, and a September 2, 1983 meeting between CP&L and the NRC referring to RII: GFM 50-400/83-16, CP&L submitted a supplementary response on September 23, 1983 stating our intentions relative to additional NRC concerns identified at the September 2, 1983 meeting. Attached is Carolina Power and Light Company's update of the actions which have been taken on the subject NRC concerns.

It is considered that the actions taken are satisfactory for the 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)

**Attachment to CP&L Letter of Supplementary Response to the NRC Report RII:
GFM 50-400/83-16**

Subsequent to our June 16, 1983 response to the NRC Report No. GFM 50-400/83-16, dated May 19, 1983, concerning cable tray support welding inspection, the following clarifies our actions relating to the NRC concerns:

- a. Our program as related to supports already in place.

A method has been developed to assure that cable tray support inspections will not be overlooked. This method is incorporated into site procedure AP-IX-21 (Documentation of Installation and Inspection of Seismic Electrical and HVAC Supports). A work package concept has been developed uniquely identifying supports with pertinent information and inspection reports enclosed. Any questions that arise during the development of the work packages will be reverified in the field.

- b. How assessment of inspection access would be accomplished (NRC felt that the inspection groups must have input).

Surveillance teams, consisting of a Q.C. welding inspector and a Discipline Engineer, surveyed the cable tray supports and identified areas where access was a problem. Marked-up drawings were used indicating inaccessible areas. The identified areas are being dispositioned.

Initially, we stated that while inspecting cable tray, the CI inspection group would be alert for potential access problems. But rather than have the raceway inspector attempt to anticipate or identify potential access problems for cable tray support related inspections, a more effective method was initiated. Discipline Engineers and C.I. personnel identified areas of the plant which were going to be the most congested and posed potential access problems. First priority for release of cable tray support inspection packages was given to those areas to prevent future access problems.

- c. How shop and field welds are distinguished.

Fabrication drawings and erection drawings, as modified by applicable FCR's and DCN's, are used to identify field welded connections. These connections are identified and documented in the support package.

- d. How removal, reinstallation and reinspection of supports and tray will be handled and controlled (AFRR's - Authorization for Removal and Rework, and RRN's - Removal and Reinstallation Notification, are of concern to the NRC).

If it is necessary to remove items to allow access for inspection, the removal, reinstallation and reinspection will be accomplished and controlled in accordance with procedures. WP-206 (Documentation and Control of the Installation and Termination of Electric Cable) addresses the removal and rework of cable. WP-205 (Documentation and Control of the Installation of Conduit, Cable Tray, and Boxes) addresses the removal of raceways. These procedures, as well as procedure AP-X-05 (Removal Notification of Previously Inspected Items) have been reviewed to ensure adequate controls exist.

e. Protection of cable already pulled.

General guidance for the protection of cable during installation and/or rework is covered in WP-206 and WP-210 which address acceptable means of protecting cable with regard to support, protection from surrounding work, etc.