



Carolina Power & Light Company

P. O. Box 101, New Hill, N. C. 27562
February 7, 1984

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

NRC-178

Dear Mr. O'Reilly:

In reply to your letter of October 19, 1983, referring to RII: PRB 50-400/83-25-06 (Violation F), we sent our response (NRC-145) to you on November 18, 1983. Based on additional discussions with Mr. W. P. Ang during an on-site NRC audit (January 17-20, 1984), we wish to revise our original response. The attached is Carolina Power & Light Company's revised response to the referenced violation.

It is considered that the actions taken and planned will be 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)

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Reported Violation:

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by and performed in accordance with instructions, procedures, or drawings.

1. FSAR, Section 1.8, page 50, commits to compliance with NRC Regulatory Guide 1.38 and ANSI N45.2.2-1972. AP-XIII-05, Revision 12, requires the reactor internals to be stored in accordance with the manufacturer's instructions. The NSSS Component Receiving and Storage Criteria, dated March 1976, states that storage criteria was in accordance with ANSI N45.2.2-1972. During inspection of the storage condition for the upper reactor internals stored in the reactor vessel and an inspection of storage areas in the auxiliary building, the following items were noted:
 - a. ANSI N45.2.2-1982, paragraph 6.2.1, required access control to storage areas.
 - b. ANSI N45.2.2-1972, paragraph 6.2.2, required storage areas to be cleaned to avoid accumulation of trash, discarded packaging materials, and other detrimental soil.
 - c. ANSI N45.2.2-1972, paragraph 6.3.3, prohibits the storage of hazardous chemicals in close proximity to important nuclear items.

Contrary to the above:

- a.
 - (1) On July 23, 1983, and twice on July 25, 1983, the materials storage area in the auxiliary building was found unlocked and without an attendant.
 - (2) The storage area for the reactor internals was not posted as a controlled area and unrestricted access to the storage area was observed.
 - b. Underneath the reactor upper internals cover and on the upper internals, over six wads of used tape, two rolls of tape, and cleaning cloth were observed. In addition, the RV flange was not protected and numerous cigarette butts were observed on the RV flange grooves.
 - c. A can of cutting fluid was observed to be stored on top of the upper reactor internals and underneath its canvas protective cover.
2. On August 25, 1983, a craftsman working on the upper internals lifting rig informed the inspector that he had taped over the spray nozzle holes of the upper internals because he was concerned about dropping something into the holes while working above them. He further stated that he determined how deep the holes were by dropping a nut tied to a string into the holes.

Contrary to the above, the craftsman did not have a procedure for determining the depth of the holes and for taping the holes.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The existing procedure was not implemented as required. In addition, the procedure was too inflexible to be used efficiently.

Corrective Steps Taken and Results Achieved:

Valve storage areas and the reactor vessel internals storage area are being locked during non-working hours and during times when access to the areas is not required.

Valve storage areas have signs posted at the entrance allowing authorized personnel only to enter the area as well as forbidding the use of tobacco, food or beverages.

The reactor vessel internals have been cleaned of subject debris, and stored in the reactor vessel which is in a relatively isolated area. Polyethylene was originally used to seal the internals inside the vessel and a barricade was installed with a lockable door to restrict access. A sign was placed at the entrance designating the area as Zone 4.

Since this reply was originally sent to the NRC, the reactor vessel head has been placed on the reactor vessel, thus, preventing access to the internals. The barricade has been replaced with an enclosure around the entire reactor vessel, reactor vessel head, and the control rod drive mechanisms. The enclosure around the reactor vessel and associated equipment has been added to a Field Maintenance Log for storage inspections.

The work being done on the vessel internals by the craftsman without a procedure will be eliminated by the new access control for the area. Also, management has reemphasized placing covers over accesses to equipment, piping systems, etc. where the entrance of foreign objects could cause potential problems.

Corrective Steps Taken to Avoid Further Noncompliance:

AP-X-02, Project Housekeeping, will be changed. Specific inspection requirements will be added. The flexibility to add special requirements will be added. The discipline engineer responsible for equipment setting will be procedurally required to share responsibility with the Construction Manager for Housekeeping Zone designations. When the procedure is approved for special requirements, these requirements will be added to the Housekeeping Zone designation. The designation for the valve storage areas will require that these areas be locked during non-working hours and a sign posted limiting entry to Authorized Personnel. Shifts during which entry to the valve storage areas is not required will be considered non-working hours. The designation for the reactor vessel area will require that this area be locked except when personnel are actually working in the area. The zone designation will require that shoe covers be used when entering the area and a sign posted to require it. These requirements are already practiced.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved on April 1, 1984.