

CP&L

Carolina Power & Light Company

34 SEP 11 A 8:46

P. O. Box 101, New Hill, NC 27562
September 7, 1984

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

NRC-262

Dear Mr. O'Reilly:

In reference to your letter of August 9, 1984, referring to RII:
GFM/RLP 50-400/84-23-01, the attached is Carolina Power and Light
Company's reply to the violation identified in Appendix A.

It is considered that the corrective action taken/planned is
satisfactory for resolution of the item. Inasmuch as this violation
(50-400/84-23-01) was reported as being integral to a previous
violation (50-400/84-10-01), the attached response is considered to
be supplemental and adequate for resolution of the previous
violation, as well.

Thank you for your consideration in this matter.

Yours very truly,



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

RMP/jed

Attachment

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

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Attachment to CP&L Letter of Response to NRC Report RII:
GFM/RLP 50-400/84-23-01

Reported Violation:

10 CFR 50.55(f)(1) requires CP&L to implement the quality assurance program described or referenced in the Preliminary Safety Analysis Report. Section 1.8.5.16 of the CP&L quality assurance program requires that measures shall be established and implemented to assure that significant conditions adverse to quality are promptly corrected and corrective action is taken to preclude repetition.

Contrary to the above, as of June 29, 1984, the certification of all painters, as required to prevent recurrence of violation 400/84-10-01, was not completed. Your response, dated June 1, 1984, to violation 400/84-10-01, stated that you had completed the corrective action by May 25, 1984. A records review showed that uncertified painters performed applications between May 25, 1984 and June 29, 1984.

This is a Severity Level IV violation (Supplement II).

Denial or Admission and Reason for the Violation:

The violation is admitted with the following clarification:

The violation report correctly describes the condition of the painters certification records. The following discussion is offered inasmuch as there is a distinction between adequacy of records development (Violation 400/84-23-01) and absence of records in the QA vault (Violation 400/84-10-01).

The correction and preventive steps for violation 400/84-10-01 were taken with the understanding that the point of issue was that records known to exist were not in the QA vault. Consequently, the missing painter certification records were retransmitted to QA records (correction of missing record); and refinement of the records transmittal process, plus instructions of cognizant personnel, was made (prevention of further loss of records). The action of checking and updating the painter certification records (referred to in the response to Violation 400/84-10-01) was for the purpose of ensuring that the records in the discipline files were on file in the QA vault.

In summary, the actions taken and the response to violation 400/84-10-01 were based upon our understanding of the violation, its cause, and the needed corrections and preventive actions.

Corrective Steps Taken and Results Achieved:

The painters that are applying Service Level I coatings have undergone certification/re-certification to bring the records up-to-date and in compliance with procedure requirements. Copies of the records have been transmitted for filing in the QA vault.

A sampling program of adhesion tests will be conducted to confirm that quality exists for Service Level I coatings applied by painters with questionable certifications. The results of these tests will be evaluated and the coatings accepted or repaired, as appropriate.

Corrective Steps Taken to Avoid Further Noncompliance:

To ensure that painter certification records are in compliance with procedure requirements, the coatings discipline engineer now has the responsibility of reviewing and approving the certifications. Site procedure WP-44 (Painter Certification) has been revised to provide for this action.

To ensure that the Service Level I painters are certified for the application performed, the Construction Inspector now has the responsibility for making a check on the painters certification prior to acceptance of the work. Site procedure TP-29 (Inspection of Protective Coatings - Service Level I) has been revised to provide for this action.

Date When Full Compliance Will Be Achieved:

Full compliance is projected to be achieved by December 15, 1984. In the event the adhesion test results require extensive repair/rework, a new date of full compliance will be established.