



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-264

Dear Mr. O'Reilly:

In reference to your letter of August 9, 1984 referring to RII:
GFM/RLP 50-400/84-23-04, the attached is Carolina Power & 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.

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)

Attachment to CP&L Letter of Response to NRC Report RII:
GFM/RLP 50-400/84-23-04

Reported Violation:

10CFR50.55(f)(1) requires CP&L to implement the quality assurance program described or referenced in the Preliminary Safety Analysis Report. Section 1.8.5.3 of the CP&L quality assurance program requires that measures be established to control design drawings.

Contrary to the above, on January 26, 1984, CP&L issued FCR-E-2015 to approve the field use of Ebasco Drawing CAR-2166-G-311, SO1, Rev. 0, which was a preliminary drawing that had not been released for construction use. This drawing had not been reviewed and approved with CP&L inputs incorporated by July 2, 1984. The preliminary drawing was being used for final inspection acceptance by construction inspection personnel.

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

Denial or Admission and Reason for the Violation:

The violation is correct, with the following clarification:

It is admitted that the use of a Field Change Request (FCR) to approve a preliminary drawing is not specifically covered by procedure. However, the issuance of the drawing was through established document control processes that provided the required controls for the issuance and recall of documents.

Ebasco procedures require that drawings issued as Preliminary are complete at Ebasco signoff. These drawings have passed the applicable Ebasco internal procedures, reviews, and signoffs which ensure that the design information meets the appropriate QA requirements. The basis for "Approved for Construction" is to ensure appropriate CP&L engineering review (Ebasco Manual of Procedures 2.3.1.10, WELD 3.4.1).

Although the drawing in question did exhibit the Preliminary designation, they were considered approved for use in that they had passed the Ebasco internal procedures, reviews, signoffs, and CP&L engineering review had been performed and the releases controlled by the FCR and document control processes.

Corrective Steps Taken and Results Achieved:

The Ebasco drawings identified to date that were released by FCR have been released by Ebasco "Approved for Construction". We will continually be alert for any Ebasco drawings released by FCR which may not have been detected.

Corrective Steps Taken to Avoid Further Noncompliance:

HPES personnel have been instructed that FCRs will no longer be used to release preliminary drawings.

Date When Full Compliance Will Be Achieved:

Full compliance is projected to be achieved by November 1, 1984.