



Carolina Power & Light Company

84 OCT 5 P 3: 06

P. O. Box 101, New Hill, NC 27562
September 27, 1984

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

NRC-271

Dear Mr. O'Reilly:

In reference to your letter of August 31, 1984, referring to RII:
GFM/RLP 50-400/84-24-01, 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 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 50-400/84-24-01

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 1.8.5.2 and 1.8.5.10 of the CP&L quality assurance program requires that measures be established and implemented to ensure personnel performing quality functions are properly trained and possess the skills required to attain quality work. It additionally requires that inspection personnel not be actively involved in the work activities which they are inspecting.

Contrary to the above, on August 13, 1984, the NRC inspectors observed an electrical construction inspector (CI) supervising and directing a craft electrician who was making repairs to electrical terminations in computer cabinet C10-11H0051B-SB. This work had been previously completed and signed off by the craft on two previous occasions. Interviews with seven electrical CI personnel on August 16, 1984 supported the fact that CI personnel were actively involved and encouraged by supervision to direct craft personnel in clearing workmanship discrepancies.

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 acts of supervision, or lack thereof, are considered to be the basis for the violation. The process of selecting and assigning technically qualified craft personnel in conjunction with the on-going training program is considered adequate to ensure that craft personnel possess the technical ability to accomplish quality work and an understanding of procedural requirements designed to control the interface of work and inspection activities.

The violation was due to a laxity in craft supervision by not exercising proper supervisory control in their areas of accountability and an error in judgement on the part of the inspection personnel involved by not maintaining a role of independence.

Corrective Steps Taken and Results Achieved:

Instructions have been given to responsible personnel (See Corrective Steps Taken to Avoid Further Noncompliance).

Corrective Steps Taken to Avoid Further Noncompliance:

Electrical craft supervisory personnel have been reinstructed that it is their responsibility to supervise craft personnel, and to ensure that they possess the knowledge and skills necessary to perform quality work. Construction Inspection personnel have been instructed that their role of independence from the work activity must be maintained.

The electrical construction management has also placed additional emphasis on monitoring the performance of new or transferred workers to ensure they understand the procedural requirements of this project so that they will not place undue dependence on inspectors for guidance that should more properly come from supervision.

Date When Full Compliance Was Achieved:

Full compliance was achieved on September 27, 1984.

CP&L

Carolina Power & Light Company

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NRC-269

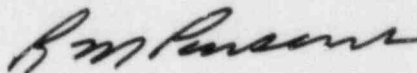
Dear Mr. O'Reilly:

In reference to your letter of August 31, 1984, referring to RII:
GFM/RLP 50-400/84-24-02, 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.

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)

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 1.8.5.15 of the CP&L quality assurance program requires that measures be established and implemented to assure that significant conditions adverse to quality be identified, promptly corrected, and that corrective action be taken to preclude repetition.

Contrary to the above, on July 13, 1984, NCR 84-1073 was closed by QA without an adequate review of the disposition and corrective action. The disposition and corrective action taken were improper and actually nonconformances to QA requirements. These items were subsequently identified by the NRC and documented by the licensee in NCR 84-1281 and 84-1293.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated with the following clarifications.

With regard to the statement in the NRC report that this violation is similar to violation 400/83-22-02, "Failure to Control Nonconformance Reports", we feel that there is a difference between this violation and 83-22-02. Specifically, this violation concerns an isolated case of handling one NCR while previous violation 83-22-02 concerned multiple cases of improper handling of nonconformance reports (i.e., 83-22-02 identified: DDRs not issued within prescribed time requirements; the site failing to comply with a verbal NRC commitment on obtaining NCR numbers; multiple instances of unauthorized personnel signing disposition acceptance on DDRs, DRs, and NCRs; site QA failing to review DRs as required; and mishandling of an individual DDR). While both violations concern nonconformance control, we do not believe that this violation indicates the same level of noncompliance as 83-22-02.

To determine if the QA Surveillance review of NCR 84-1073 represented an isolated or generic problem, a sample of nonconformance reports closed by QA Surveillance in 1984 (i.e., approximately 50%) were checked for discrepancies similar to those identified in this violation. No similar or additional problems were detected. Consequently, based on this sampling, we have concluded that this was an isolated problem.

The root cause for the inadequate review of the disposition and corrective action for NCR 84-1073 is judged to be an isolated personnel error.

The two nonconformance reports (NCR 84-1033 and DDR 2197) indicated in your report as possibly closed without sufficient retraceable documentation to justify the disposition and closure were researched by CP&L. Review by construction and QA personnel indicates that sufficient justification and adequate disposition/corrective action exists to support closure.

Corrective Steps Taken and Results Achieved:

NCRs 84-1281 and 84-1293 issued to document the discrepancies with the disposition and corrective action of NCR 84-1073 have been closed. Specific corrective actions included: issuance of rework cards, and a CWRA to cover the work; and obtaining preventive measures for Construction Inspection's (CI's) involvement.

Corrective Steps Taken to Avoid Further Noncompliance:

1. Immediate (July 25, 1984) training was held by the QA Supervisor - Surveillance for QA Surveillance - Construction first-line supervisors on the requirements of CQA-3 for closure review of nonconformance reports.
2. Nonconformance Control Procedure, CQA-3, was revised to require a corrective action report to be completed for each party responsible for corrective action.
3. CQA-3 will be further revised to provide additional controls for disposition and corrective action. These controls are to include: issuance of NCR's to the Harris Plant Construction Section Manager level for resolution; development of mechanisms to aid in evaluation of the nonconformance, determination of causes and preventive measures.

Date When Full Compliance Will Be Achieved:

It is projected that full compliance will be achieved by December 1, 1984.