



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-400/84-47

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Docket No.: 50-400

License No.: CPPR-158

Facility Name: Harris 1

Inspection Conducted: December 12-14, 1984

Inspectors: J. J. Blake 1/15/85
for W. P. Ang Date Signed

Approved by: J. J. Blake 1/15/85
J. J. Blake, Section Chief Date Signed
Engineering Branch
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection entailed 19 inspector-hours at the site during normal duty hours, in the areas of worker concerns regarding piping and pipe supports.

Results: No violations or deviations were identified.

8503060363 850116
PDR ADOCK 05000400
G PDR

REPORT DETAILS

1. Licensee Employees Contacted

- Dr. Elleman, Vice President, Corporate Nuclear Safety and Research
- *R. M. Parsons, Project General Manager Completion Assurance
- *E. J. Wagner, Engineering General Manager
- *N. J. Chiangi, Manager, QA/QC
- G. White, Supervisor, Harris Plant Engineering
- *K. V. Hate, Principal QA Engineer
- *D. C. Whitehead, QA Supervisor
- *J. W. McKay, Resident Civil Engineer
- *A. Fuller, Principal Engineer, Pipe Hanger
- *P. W. Howard, Senior Engineer, Pipe Hanger

Other licensee employees contacted included three field engineers, two QA inspectors, one construction inspector and two quality assurance auditors.

NRC Resident Inspector

*R. Prevatte

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on December 14, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Workers Concerns Regarding Piping and Pipe Support Design, Installation and Inspection

An inspection was performed to investigate workers' concerns regarding piping and pipe support design installation and inspection. The following were the concerns and the inspection findings.

a. De-Classification of the Steam Generator Feedwater System

- (1) A worker's concern was expressed that the steam generator feedwater system in the turbine building was de-classified by the

licensee from safety class 4/seismic 1 to non-seismic to avoid performing extensive and costly rework including inspections and documentation.

- (2) Harris Final Safety Analysis Report (FSAR), Section 1.8, provides the licensee's commitments to NRC Regulatory Guides 1.26 and 1.29. Regulatory Guide (RG) 1.26 provides a quality classification system for safety-related components. Regulatory Guide 1.29 provides a system for identifying those plant features that should be designed to withstand the effects of a safe shutdown earthquake. The following documents were reviewed for compliance with the FSAR and RG 1.26 and RG 1.29.
 - (a) Carolina Power & Light Letter CE-13476 dated August 20, 1982, from A. B. Cutter, CPL Vice President for Engineering, to H. Oslick, EBASCO Services, Inc.
 - (b) EBASCO Letter EB-C-14332 dated November 12, 1982, from R. K. Matzelle, Project Manager, to L. I. Loflin, Manager, Harris Plant Engineering.
 - (c) Field Change Request H-1145, approved March 2, 1983, and H-1145 Revision 1, approved May 26, 1983.
 - (d) EBASCO Services Incorporated Drawing 1A-261-FW-5, Revision 6 - Turbine Building #1, Feedwater Piping
 - (e) EBASCO Services Incorporated Drawing 1A-261-FW-1, Revision 6, Auxiliary Building #1, Feedwater Piping
- (3) Based on the review of the above noted documents, the licensee appears to be complying with the noted FSAR commitments and RG 1.26 and RG 1.29 requirements.

No violations or deviations were identified.

b. Substitution of Non-Q Fasteners for Q Fasteners

- (1) A worker's concern was expressed regarding the substitution of non-Q fasteners for Q fasteners. The worker indicated that the CPL Vice President (VP) for Nuclear Safety was contacted regarding this concern. The VP for Nuclear Safety investigated the matter and considered it to be safe. The worker did not consider the substitution of non-Q fasteners for Q fasteners to be safe.
- (2) The NRC inspector contacted Dr. Elleman, CPL VP for Corporate Nuclear Safety and Research, to determine if he had reviewed any worker's concerns regarding the substitution of non-Q fasteners for Q fasteners at the Harris site. The VP stated that he had called a Harris Field Engineer, who had provided CPL with

various documents, to determine his concerns. One of the concerns was in relation to Deficiency and Disposition Report (DDR) 1958 and Purchase Order (PO) 40924 regarding the substitution of non-Q-fasteners for Q fasteners at Harris. The VP stated that he had the concern investigated by a panel that was formed to investigate QA inspector concerns. The panel's findings regarding the concern was that appropriate effort to segregate Q from non-Q fasteners existed, minimal changes would be required for substituting non-Q for Q fasteners, and that purchase order specifications would allow upgrading non-Q fasteners to Q. The VP stated that the field engineer was informed of these findings and the field engineer was satisfied with the resolution.

(3) The NRC inspector's investigation of the concern regarding the substitution of non-Q fasteners for Q fasteners as noted by DDR 1958 revealed the following:

- (a) NRC RII Report 50-400/83-29 identified violation 400/83-29-01, on August 24, 1983, regarding the use of non-Q bolting material in Q "Class" systems, fire protection and radiation waste.
- (b) On August 26, 1983, Discrepancy Report M-403 was issued regarding the use of non-Q bolting material, P. O. 40924, on a flanged connection to a radiation monitor.
- (c) On September 1, 1983, DDR 1958 was issued regarding the potential for use of non-Q fasteners, including P. O. 40924, in safety-related applications.
- (d) On April 24, 1984, 300 1/2" A194, 2H, NUTS, P. O. QA-H-40924-1, were upgraded from non-Q to Q by performing an "Upgrade Inspection."

(4) Violation 400/83-29-01 and DDR-1958 were still open issues during this inspection. Licensee corrective action will be verified for closure of the violation. Based on the worker's concern regarding the substitution of non-Q fasteners for Q fasteners, no new violations or deviations were identified.

c. Inadequate controls for Implementation of 1200 Generic Field Change Requests (FCR) and 1000 Generic Requests for Clarification of Information (RCI) for WP-110.

(1) A worker's concern was expressed that WP-110, Rev. 7 and 8, Hanger Installation, had 1200 Generic FCRs and 1000 RCIs that had to be applied to the hanger installation program. The implication was that these should have been addressed in a more controlled fashion rather than having to remember a long list of Generic FCRs and RCIs.

- (2) The NRC inspector reviewed the following procedures:
- (a) WP-110, Revision 11, Installation of Seismic Pipe Hangers and Supports for Seismically Analyzed Pipe
 - (b) AP-1X-05, Revision 30, Field Change Request (FCR/PW)
 - (c) AP-1X-15, Revision 10, Implementation of DCNs, FCRs and PWs
 - (d) AP-1X-04, Revision 13, Request for Clarification of Information

The above noted procedures, FCRs in general, and the following randomly selected pipe support-related open FCRs were reviewed for adequacy of controls to assure implementation of FCRs:

FCR-H-1133
 FCR-H-1150
 FCR-H-1183
 FCR-H-1206
 FCR-H-1248
 FCR-H-1351
 FCR-H-1387

- (3) Based on the above noted reviews, the inspector had the following observations:
- (a) Revision 13 of AP-1X-04 cancelled the procedure for RCIs. RCIs are no longer in use for pipe support installation. The licensee stated that open RCIs at the time of the procedure cancellation were voided or incorporated in procedures.
 - (b) Approximately 62 open FCRs applied to pipe support installation. Of the seven open FCRs selected for review, four of the FCRs had already been incorporated into site procedures or specifications but had not been closed.
 - (c) AP-1X-05 and AP-1X-15 provided controls for assuring implementation of FCRs.

No violations or deviations were identified.

d. Worker's Concern Regarding Disposal of Pipe Support Records

- (1) A worker's concern was expressed that pipe support records were found in a trash can.
- (2) An NRC inspection documented on NRC RII Report 50-400/84-43 has been performed regarding the above noted concern. A follow-up inspection was performed to determine if other individuals had any knowledge regarding disposal of pipe support records. Three pipe

support field engineers, two CI pipe support inspectors, a QC inspector, two QA pipe support surveillance auditors and their supervisor were randomly selected by the NRC inspector and were interviewed to determine if they had any knowledge of pipe support records being disposed of. In addition, other concerns regarding accessibility to NRC and intimidation of personnel regarding nonconformance reporting were also addressed during the interviews.

- (3) During the interviews, the personnel interviewed expressed the following in general:
- (a) Some pipe support records have been observed to be missing from their packages. Most of the time the records were misplaced and retrieved. In some instances reinspections had to be performed and records re-created.
 - (b) All interviewees were aware of the licensee's open access policy regarding contacts with the NRC. None of the interviewees felt that there were any licensee controls to preclude contact with the NRC.
 - (c) Although some of the interviewees were not aware that CQA-3 allowed anybody to report nonconformances, none of the interviewees expressed any concern regarding pressure against writing nonconformances. The adequacy of training regarding CQA-3 was addressed in a concurrent NRC inspection and will be documented by RII Inspection Report 50-400/84-45.

No violations or deviations were identified.