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CP&L

Carolina Power & Light Company

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SHEARON HARRIS NUCLEAR PROJECT
P. O. Box 101
New Hill, North Carolina 27562

File Number: SHF/10-13510E
Letter Number: HO-860233 (O)

Dr. J. Nelson Grace
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30323

NRC-416

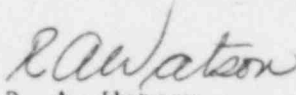
Dear Dr. Grace:

In reference to your letter of January 14, 1986, referring to RII: CFM/SPB 50-400/85-49-01, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

If you should have any questions concerning this matter please do not hesitate to contact me.

Thank you for your consideration in this matter.

Yours very truly,



R. A. Watson
Vice President
Shearon Harris Nuclear Power Plant

RAW:cwj

Attachment

cc: Messrs. G. Maxwell (NRC-SHNPP)
B. C. Buckley (NRC)

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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 1.8.5.3 of the CP&L PSAR (versus the Quality Assurance program as stated in the Notice of Violation) requires that measures be established to insure that drawings are in accordance with documented plant configuration.

Contrary to the above, drawings were not in accordance with the documented plant configuration in that on December 17, 1985, the resident inspectors found the as-constructed condition of the reactor coolant system (RCS), described in EBASCO drawing CAR-2165-G-800, Rev. 11, did not show the connections for the reactor vessel level instrumentation system (RVLIS) piping. The RVLIS was installed using Field Change Request M-873 and Design Change Notice 530-1199, neither of which referenced drawing CAR-2165-G-800 as requiring updating due to the RVLIS addition.

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

Denial or Admission and Reason for the Violation:

CP&L admits the violation. The cause was lack of identification in Field Change Request M-873 and Design Change Notice 530-1199 of the need to change the related RCS flow diagram.

Corrective Steps Taken and Results Achieved:

Subsequent to the inspector's observation, CP&L issued Revision 12 to the RCS flow diagram (2165-G-800) which incorporated Field Change Request P-4854 and Revision 2 of the RVLIS flow diagram (2165-G-844). The revised RCS flow diagram shows the RVLIS cross connection.

Corrective Steps Taken to Avoid Further Noncompliance:

1. Performed a check of flow diagrams to ensure that diagram-to-diagram and/or system-to-system cross references were shown. The cross check was performed on both nuclear safety-related and nonsafety-related flow diagrams. On the nuclear safety-related systems (53 flow diagrams involved), no discrepancies were found. Thus, the condition observed by the inspector is considered an isolated occurrence.
2. Reviewed and discussed with Design Leads at the January 7, 1986 Harris Plant Engineering "Quality Circles" meeting the condition identified by the Inspector.
3. Revised the Mechanical Drafting Room Manual to clarify the responsibilities of the checker.

Date When Full Compliance was Achieved:

Full compliance was achieved on February 11, 1986.