

CP&L

Carolina Power & Light Company

86 DEC 19 A10: 44

HARRIS NUCLEAR PROJECT
P. O. BOX 165
New Hill, NC 27562
DEC 16 1986

File Number: SHF/10-13510E
Letter Number: HO-860394 (0)

NRC-513

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

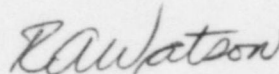
Dear Dr. Grace:

In reference to your letter of November 17, 1986, referring to RII: 50-400/86-80-01, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

It is considered that the corrective actions taken/planned are satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Very truly yours,



R. A. Watson
Vice President
Harris Nuclear Project

RAW/sdg

Attachment

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

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Attachment to CP&L Letter of Response to NRC Report RII:
50-400/86-80-01

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 1.8.5.5 of the CP&L Quality Assurance Program requires that activities affecting quality shall be prescribed by documented procedures. Periodically updating safety-related drawings is an activity affecting quality.

Contrary to the above, activities affecting quality were not prescribed by documented procedures, in that procedures were not established to assure drawings were periodically updated. On October 9, 1986, the inspectors identified three main control board panel drawings which had numerous design changes for incorporation and had not been revised since 1982. A 1982 CP&L internal memorandum does describe a frequency for updating various classes of drawings.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The three main control board panel drawings (Westinghouse vendor drawings) noted by the inspector had not been revised since 1982.

During the Control Room Design Review new site generated main control board drawings were prepared showing engraving and demarkation details as well as pertinent details shown on the Westinghouse drawings. These site drawings were kept current and reflect the as-built condition. For this reason it was not considered necessary to maintain the Westinghouse Drawings.

Corrective Steps Taken and Results Achieved:

The Westinghouse Main Control Board Drawings Nos. 1364-2217, 1364-2317 and 1364-2280 will be revised to reflect the as-built condition as shown on the site generated drawings. Once the Westinghouse drawings are revised the site generated drawings will be voided.

Corrective Steps Taken to Avoid Further Noncompliance:

Based on the questions raised by the inspector, HPES Instruction 3.26 "Maintenance Criteria For Updating Design Drawings" was issued on October 20, 1986. This instruction supplemented the existing procedural structure in place to control design drawing generation and revision.

Date When Full Compliance Will Be Achieved:

It is projected that the series of drawings in question will be revised and issued by January 30, 1987.