

CP&L

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

January 8, 1980

JAN 11 AM 11:23

Robinson File No: 2-0-4-a-4

SERIAL:RSEP/80-23

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/79-25

Dear Mr. O'Reilly:

We have received and reviewed the subject report and are hereby responding to the infraction and deficiency as requested.

Enforcement Item

Infraction

As required by 10 CFR 50, Appendix B, Criterion V, "Activities affecting quality shall be described by documented instruction, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings". Carolina Power and Light Company's letter from E. E. Utley to G. Lear, U. S. Atomic Energy Commission, dated August 12, 1974 (Serial Number: NG-74-937) entitled Quality Assurance Program states in part that the Quality Assurance Program is in compliance with Appendix B to 10 CFR Part 50. Paragraph 2 of IE Bulletin Number 79-14 dated July 2, 1979, states in part, "Include in the inspection: Pipe run geometry, support and restraint design, locations, function and clearance (including floor and wall penetration); embedments, (excluding those covered in IE Bulletin 79-02); pipe attachments; and valve and valve operator locations and weights (excluding those covered in IE Bulletin 79-04)".

8003210065

8053

Letter to Mr. James P. O'Reilly

Serial:RSEP/80-23

January 8, 1980

Page 2

Contrary to the above, the instructions specified in IE Bulletin 79-14 and Carolina Power and Light Company Special Inspection Procedure Revision 0 of July 12, 1979 were not adhered to. During IE Bulletin 79-14 inspection, Carolina Power and Light Company failed to identify the design and location of several supports and restraints.

Discussion

The program developed to comply with IE Bulletin 79-14 is based on the Bulletin Requirements as interpreted and described in our letter of August 2, 1979. Basically, the program is designed to verify that all documentation used as input into the record design seismic stress analysis reflects actual "as-built" conditions. In this respect, as identified in our August 2, 1979 letter, inspection packages were prepared to be followed by the field inspectors. These inspection packages were developed by the architect engineering organization which performed the original plant seismic analyses. Each package provided an undimensioned piping isometric showing pipe geometry and relative location of seismic restraints and system components included as input to the stress analysis. The package also provided sketches of the seismic restraints designed to be installed at the identified positions. The inspector was required, as a minimum, to do the following:

1. Verify pipe geometry as described by the isometric and identify and correctly draw all geometric deviations found.
2. Dimension the corrected isometric.
3. Locate (dimensionally) and verify all seismic restraints identified on the isometric are as designed and identify all structural deviations found.
4. Locate (dimensionally) all identified components.

Any supports or hangers located on the pipe inspected additional to the seismic restraints identified by the stress analyst in the package provided to the field inspector were not considered in the stress analysis. The inspectors were not required to provide any information concerning those supports. These additional supports and hangers were considered as dead weight supports only in the analysis. This approach was consistent with that described in the August 2, 1979 letter in that only those supports modeled into the stress analysis were of concern in the verification program associated with the bulletin.

Corrective Action

As identified in the discussion, with regard to the identification and location of additional supports and restraints, it is believed that the requirements of the bulletin were met. However, to insure that all supports and restraints are considered, we have initiated a reverification program presently scheduled to be

Letter to Mr. James P. O'Reilly
Serial:RSEP/80-23
January 8, 1980
Page 3

- completed by the end of February, 1980. In this program, all the seismic restraints will be reverified as to proper design and function, all discrepancies reidentified, and all previously described dead weight supports will be located and identified by type. All data will be reviewed by the stress analyst and structural engineers to determine any effects on the previous analyses. Any identified problems will be corrected as described in our earlier correspondence.

Corrective Action To Prevent Further Non-Compliance

All future inspections will be as described above and will prevent further non-compliance in this area.

Date When Full Compliance Will Be Achieved

The reverification program described above is scheduled to be completed by February 29, 1980.

Deficiency

As required by 10 CFR 50, Appendix B, Criterion XVII, "Inspection and Test Records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted". Carolina Power and Light Company's letter from E. E. Utley to G. Lear, U. S. Atomic Energy Commission dated August 12, 1974 (Serial Number: NG-74-937) entitled Quality Assurance Program states in part that the Quality Assurance Program is in compliance with Appendix B to 10 CFR Part 50. Section XVII 4.b of the above noted Carolina Power and Light Company letter states, "Inspection and Test Records shall contain the following as appropriate: identification of the inspector or data recorder".

Contrary to the above, the data and inspection records obtained during the accomplishment of IE Bulletin 79-14 and Carolina Power and Light Company Special Inspection Procedure Revision 0 of July 12, 1979 do not identify the inspector or data recorder.

Corrective Action

To correct this deficiency, the Plant has initiated action that will: 1) review and revise, as necessary, the modification and inspection procedures associated with the program to require appropriate signatures of those persons involved with taking, reviewing and accepting data, and 2) will adequately document on each inspection package the person(s) which performed, reviewed and accepted the inspections and analyses already completed.

Letter to Mr. James P. O'Reilly
Serial:RSEP/80-23
January 8, 1980
Page 4

Corrective Action To Prevent Further Non-Compliance

All procedures related to the reverification program will be revised as described above. Appropriate use of the revised procedures will prevent further non-compliance in this area.

Date When Full Compliance Will Be Achieved

All procedures will be revised by January 15, 1980. All documentation completed to date will be reviewed and revised by February 29, 1980 to adequately identify the persons which inspected, reviewed and accepted the data.

If additional information is required, please notify me.

Very truly yours,



R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

MFP:pb

cc: V. Stello (1)