

CP&LUSNRC REGION
II**Carolina Power & Light Company**

H. B. ROBINSON STEAM ELECTRIC PLANT 8: 44
Post Office Box 790
Hartsville, South Carolina 29550

Company Correspondence

NOV 19 1980

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

Serial:RSEP/80-1852

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
UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/80-26

Dear Mr. O'Reilly:

We have received and reviewed the subject report based on your inspection during the period 9/29/80 - 10/2/80 and are hereby responding to the stated infractions as requested.

Infractions

- A. As required by Technical Specifications Section 6.8, written procedures and administrative policies shall be established, implemented and maintained for the Fire Protection Program. The Fire Protection Program implementation procedures for the control of the hazards associated with welding and cutting operations are contained in CP&L's Plant Operating Manual Volume 19 - Fire Protection Manual, Hot Work Procedure FP-1. This procedure requires a permit signed by a person designated by the plant manager who is to inspect the area prior to initiation of the hot work operation; floors within 35 feet of the work are to be swept clean of combustibles or covered; a fire watch to be provided for all hot work; and, the fire watch to be equipped with a portable fire extinguisher.

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Contrary to the above, on September 29 and October 2, 1980, a number of welding operations were being conducted within the containment area adjacent to safety related equipment which were not in conformance with the fire prevention welding and cutting procedure. Some typical examples are as follows:

1. Welding and cutting operations were being conducted without an approved "Hot Work Permit".
2. Welding and cutting operations were being conducted directly over combustible materials, i.e., floors had not been swept clean.
3. Fire watches were not assigned to observe "hot work" operations.
4. Fire extinguishers were not provided in the vicinity of welding and cutting operations.

Corrective Action

(The following responses relate to Items A.1 through A.4 above.)

1. It was determined that the Hot Work Permits that had been issued were not specific enough in describing work locations but rather covered general area. As a result, permits were not posted in each specific work area. To correct this situation, permits describing locations more specifically were issued and posted.
2. Floors in the immediate work areas were cleaned of combustibles or covered.
3. & 4. Fire Watches with fire extinguishers were assigned to each hot work area.

Corrective Action to Prevent Further Non-compliance

The above infraction resulted because construction contract personnel were not properly following the requirements of Hot Work Procedure FP-1. To correct this situation, personnel involved in welding or other hot work activities were assembled and the requirements of Procedure FP-1 were reviewed in detail. The necessity of complying with all aspects of Procedure FP-1 was stressed. Supervisors were instructed to monitor this item very carefully and to take appropriate action to prevent recurrence.

To continue to ensure that construction personnel understand and implement requirements of Hot Work Procedure FP-1, the following actions will be taken:

- A. Appropriate excerpts from plant fire protection procedures as applicable to hot work will be included in a "required hot work reading procedure file". All contract supervisors and personnel involved in welding or other hot work activities will be required to read and understand this material.
- B. Construction Work Procedure WP-500 (General Welding Procedure) will be revised so as to reference appropriate fire protection procedures. All welders will be required to read WP-500 and the "required hot work reading procedure file" before being issued their welding symbol. Revision to WP-500 will be accomplished by January 1, 1981.
- C. The construction safety supervisor has been instructed to maintain a log of any personnel not complying with the procedural requirements and to report same to the job superintendent for immediate follow-up corrective action.
- D. Personnel not adhering to procedural requirements will be reprimanded and/or disciplined as appropriate by the on-site management involved.

Date When Full Compliance Will Be Achieved

We will consider ourselves to be in full compliance when Items A and B above are completed on January 1, 1981.

- B. As required by Technical Specifications Section 6.8, written procedures and administrative policies shall be established, implemented and maintained for the Fire Protection Program. The implementation procedure for the storage of equipment and components to prevent damage or degradation are contained in Construction Procedure AP-1X-04, Material Storage, and for storage of piping in process are included in Construction Procedure WP-107, Cleanliness Maintenance of Piping Systems.

Contrary to the above, the following procedure violations were noted:

1. Fire pump diesel engine was stored outside. Section 4.3 of Procedure AP-1X-04 requires items such as diesel engines to be stored in a standard (Class 2) weathertight warehouse or equivalent enclosure.
2. Fire pump engine controller was stored in a combustible work shed and engine batteries were stored outside. Section 4.2 of Procedure AP-1X-04 requires items such as batteries and engine control panels to be stored in a standard (Class 1) fire resistant, temperature controlled warehouse or equivalent enclosure.

3. Fire pump engine, batteries, and controller were not identified for traceability and status. Section 4.6 of Procedure AP-1X-04 requires all fire protection "Q" List materials to be tagged for identification, traceability and status.
4. Fire protection piping being installed in the containment was not sealed or capped when ends were not being worked on. Section 3.7 of Procedure WP-107 requires component ends to be appropriately plugged or sealed against entry of containment during times when ends are not being worked on.

Corrective Action

(The following responses relate to Items B.1 through B.4 above.)

1. & 2. The fire pump diesel engine was covered with polyethelene sheet material and shortly moved with the controller and batteries to the work area for installation. Subsequent functional testing and operation of the engine revealed no damage to these associated parts.
3. This equipment had been previously tagged, but tags were missing at the time of the inspection. The equipment was re-labeled with replacement tags.
4. The ends of all piping not being worked were sealed with tape.

Corrective Action to Prevent Further Non-compliance

The above procedure violations indicated that construction contractor personnel were not fully complying with the storage requirements of equipment prior to and during installation. To correct this situation, the appropriate warehousing receiving and piping personnel were required to review Construction Procedures AP-1X-04 and WP-107 in detail with the Warehousing Supervisor and Site Superintendent. Instructions were issued to the Supervisor to monitor daily receiving and storage practices to ensure compliance with appropriate procedures. Also, QA/QC personnel were requested to monitor more closely the sealing/capping of pipe ends and report any non-conformances to the Construction Site Representative.

To ensure that construction contractor personnel are complying with the requirements of Procedures AP-1X-04 and WP-107, all contract supervisors and warehousing personnel will be required to read these procedures. Periodic spot checking will be performed by QA/QC personnel and non-conformances will be noted for immediate corrective action by the Construction Site Representative.

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Date When Full Compliance Will Be Achieved

The above actions will be complete and we shall be in full compliance by January 1, 1981.

If additional information is required, please contact me.

Very truly yours,



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

RTC/tm

cc: V. Stello (1)