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 MORGAN, R. E. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-261/87-07.
 Corrective actions: piping spool drawing used for inservice
 insp program reviewed for correction of subj footnote &
 piping isometric sketches being revised.

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Carolina Power & Light Company

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Robinson File No: 13510E

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
INSPECTION REPORT 87-07

Dear Sir:

Carolina Power & Light Company (CP&L) provides this response to the alleged violation discussed in USNRC Inspection Report No. 50-261/87-07.

Alleged Severity Level IV Violation 50-261/87-07-01

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. CP&L Special Procedure SP-681 stated that, "calibration blocks shall be of the same nominal diameter and nominal wall thickness as the item to be examined, and shall contain notch reflectors." CP&L's system Drawing 219 identified the piping material for weld joint CPW-188 as eight inch Schedule 120.

Contrary to the above, on April 20, 1987, re-examination of weld joint CPW-188 by the NRC inspector using ultrasonic examination revealed that CP&L Drawing 219 had incorrectly identified the piping material as eight inch Schedule 120, when in fact, the pipe material was eight inch Schedule 160. CP&L's calibration block for this piping system had been procured to meet the drawing requirements. Pipe examinations performed using a calibration block with notch reflectors that are not the same nominal diameter and same nominal thickness are invalid because of uncertainties in the examination volume coverage and classification/evaluation of indications.

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RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the violation.

2. Reason for the Violation if Admitted

The drawing, CP&L Sketch CPL-219, included a footnote stating eight inch (8") Schedule 120 to accommodate possible redesign of the piping by future Plant modification since this Schedule was presumed to be within the tolerance allowed by the ASME for calibration blocks. The footnote of the sketch was not the basis for block selection. Actual selection of the calibration block utilized was based on ASME Code Case N-98 and the Sketch was referred to only for other piping information. The Authorized Nuclear In-Service Inspector (ANII) concurred with this decision and, since the criteria of IWA-2240 and the N-98 Code Case were in compliance with NRC requirements, no relief request was in order.

3. Corrective Steps Which Have Been Taken and Results Achieved

Piping spool drawing used for the In-Service Inspection program have been reviewed for correction of the subject footnote wherever it appears.

4. Corrective Steps Which Will Be Taken to Prevent Repetition of the Violation

Revision of the piping isometric sketches affected is in progress. Also, a Code inquiry as to assure the applicability of Code Case N-98 will be submitted to the ASME with regard to IWA-2232, Section XI, Division I of the 1977 Edition through the Summer 1978 Addenda. Additional calibration blocks will be procured, if appropriate, pending the ASME response to the Code inquiry.

5. Date When Full Compliance Will Be Achieved

The review and required revision of piping isometric sketches will be completed within the next six months.

If you have any questions concerning this response, please contact my staff.

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson S. E. Plant

DAS:jch

cc: J. N. Grace
H. E. P. Krug
R. W. Prunty
H. J. Young