

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9012270003 DOC.DATE: 90/12/20 NOTARIZED: NO DOCKET #
FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261

AUTH.NAME AUTHOR AFFILIATION
DIETZ,C.R. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-261/90-24.
Corrective actions:verification of accuracy of inservice
insp isometric sketches will be performed during first
period of third 10-yr interval.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME	PD2-1 PD	LTTR	ENCL		ID CODE/NAME	LO,R	LTTR	ENCL
INTERNAL:	AEOD		1	1		AEOD/DEIIB		1	1
	AEOD/TPAB		1	1		DEDRO		1	1
	NRR MORISSEAU,D		1	1		NRR SHANKMAN,S		1	1
	NRR/DLPQ/LPEB10		1	1		NRR/DOEA/OEAB		1	1
	NRR/DREP/PEPB9D		1	1		NRR/DRIS/DIR		1	1
	NRR/DST/DIR 8E2		1	1		NRR/PMAS/ILRB12		1	1
	NUDOCS-ABSTRACT		1	1		OE DIR		1	1
	OGC/HDS1		1	1		REG FILE 02		1	1
	RGN2 FILE 01		1	1					
EXTERNAL:	EG&G/BRYCE,J.H.		1	1		NRC PDR		1	1
	NSIC		1	1					

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 22



Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA, 29550

DEC. 2 0 1990

Robinson File No: 13510E

RNPD/90-4132

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23

NRC INSPECTION REPORT NO. 50-261/90-24; REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the notice of violation identified by NRC Inspection Report No. 50-261/90-24:

Severity Level IV Violation (RII-90-24-01)

10 CFR 50, Appendix B, Criterion V as implemented by Carolina Power and Light Company Corporate Quality Assurance Manual, Section 6, paragraph 6.3.2 requires that, the accomplishment of activities affecting quality shall be in accordance with approved procedures and/or drawings which are appropriate to the circumstances.

Contrary to the above, on October 3, 1990, the inspector observed that an inservice inspection isometric sketch (No. CP&L-234B) did not accurately depict the actual pipe configuration in that, three welds were not shown for the piping run illustrated. Subsequent review by the licensee established that similar errors existed on other isometric sketches. Inaccurate isometric sketches could result in an inadequate total weld population subject to inservice inspection and could result in nondestructive examiners performing inservice inspections on incorrect welds.

9012270003 901220
PDR ADOCK 05000261
Q PDR

2601 1/1

1. The Reason for the Violation

The cause of this violation is attributed to the fact that the drawings used to select the welds to be inspected had not been updated to reflect the as-built configuration of the piping. As these drawings have continued to be used for the ISI program, it was not recognized that because not all welds are shown, the possibility existed for the nondestructive examiners to inspect the wrong weld.

The selection criteria used at H. B. Robinson for Class 1 and 2 weld examinations is based on 10 CFR 50.55a, which allows for the use of the rules contained in the 1974 edition through the 1975 summer addenda of Section XI of the ASME Code for the extent of the examination. In establishing the program for the second ten year inspection interval, H. B. Robinson utilized a conservative accounting method based on drawing review to identify the weld population to be examined.

2. The Corrective Steps That Have Been Taken and the Results Achieved

The Isometric Sketch discussed in the violation was walked down in the field following the inspector's findings and revised accordingly. This walkdown and subsequent revision of the weld count resulted in the determination that, based on the conservative counting method used in the development of the second ten year interval program, an adequate number of welds had in fact been selected for examination in the original program. In that the Code only requires that a percentage of the total weld population be selected, and that the required percentage was met, a violation of the Code does not exist. Therefore, further immediate corrective action is not required.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

The methodology for selection of the number of welds for inspection will be continued to assure that an adequate and conservative population is identified. In order to preclude additional violations of this nature, verification of the accuracy of the ISI isometric sketches will be performed during the first period of the third ten year interval. This verification will include a physical walkdown as well as other means as may be determined appropriate, and will be followed by drawing revision as necessary.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved during the first period of the third ten year interval, which is presently scheduled to start no later than February, 1992, and end in June, 1995.

Letter to U.S. Nuclear Regulatory Commission
Serial: RNP/90-4132
Page 3

Should you have any questions regarding this matter, please contact
Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours


Charles R. Dietz
Manager

Robinson Nuclear Project Department

RDC

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO