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ACCESSION NBR:9402030210 DOC.DATE: 94/01/27 NOTARIZED: NO DOCKET #  
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SUBJECT: Suppls response to violations noted in insp rept  
 50-261/93-25.Corrective actions:changes made to insp  
 requirements to specifically identify insp of each weld.

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Robinson File No.: 13510E  
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**JAN 27 1994**

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
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NRC INSPECTION REPORT NO. 50-261/93-25 SUPPLEMENTAL REPLY TO A  
NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) hereby provides this supplemental reply to the Notices of Violation identified in NRC Inspection Report 50-261/93-25. As discussed in a telephone conversation with Mr. W. P. Kleinsorge of your office on December 29, 1993, this reply contains additional information concerning the corrective actions taken for the violations.

The enclosure provides a description of each occurrence, the causal factors and root causes identified, and a discussion of the corrective actions taken and planned for the occurrences.

Should you have any questions regarding this matter, please contact Mr. W. J. Dorman at (803) 383-1186.

Very truly yours,

Charles R. Dietz  
Vice President

010082

RDC:lst  
Enclosure  
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9402030210 940127  
PDR ADDCK 05000261  
Q PDR

Highway 151 and SC 23 Hartsville SC

## REPLY TO A NOTICE OF VIOLATION

### RII-93-25-01:

10 CFR 50, Appendix B, Criteria X requires that examinations, measurements, or tests of material or products processed shall be performed where necessary to assure quality. Robinson Nuclear Plant Unit 2 Specification No, CPL-HBR2-C-011, Civil Inspection Requirements Section 6.2.3, requires that QC Inspectors verify that welds are in accordance with design documents.

Contrary to the above, during this inspection, four welds on each support were missing from Support Nos. FW-6B-73 and FW-6C-109 at connections between the stiffener plates and base plates. The supports were modified by Plant Modification (PM) 988 in December, 1990. The QC Inspectors verified completion of the PM and signed off the inspection sheets.

### REPLY

#### 1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. Although a specific root cause cannot be determined, the apparent cause is attributed to oversight by the installing organization and the QC Inspector.

Plant Modification M-988, which specified these welds, was implemented during Refueling Outage 13 in 1990. The welds in question were part of a weld configuration connecting stiffener plates to the base plate for the supports. The two supports identified each have two base plates that consist of a vertical piece of tube steel welded all around to the base plate. During construction of the modification, six stiffener plates were added to each base plate. When the plates were installed, the inspection of each support modification was documented on a single page Support Weld Data Report (SWDR). Modifying the base plates with the appropriate design welds required twenty individual new welds in addition to the existing all around weld between the tube steel and the base plate. Therefore, with twenty welds to be made and inspected, and only one inspection signature required, the potential for oversight was created. With the base plates located in the same area on similar supports, the discrepancy was repeated on each base plate.

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

Since the installation of the stiffener plates during M-988, changes have been made to the inspection requirements to specifically identify inspection of each weld. Standard Specification (CPL-HBR2-C-011), Plant Operating Manual Procedure MIP-200 and the Corporate Welding Manual work together to provide individual documentation for the inspection of each weld for any support modification. These documents have been utilized during Refueling Outages 14 and 15 for weld inspections. This has reduced the potential for welds not being installed or inspected as identified on the design drawings.

The supports installed by M-988 were reviewed by the Nuclear Engineering Department. The calculations reviewed for the supports in question demonstrated that the supports were technically acceptable without the missing welds. A Design Change Backup Form was completed for each calculation to document the acceptability of the missing welds on each support. This form provides a mechanism for the associated drawings to be revised.

Modification 1104 modified the two supports in 1993. This modification was reviewed. The area of base plates was not affected.

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

The supports installed by Modification 988 are unique due to the complexity of their design and application. Based on a review of other supports, CP&L believes this to be an isolated condition, and no further modification reviews are necessary.

The utilization of the documents described above, CPL-HBR2-C-011, MIP-200, and the Corporate Welding Manual, provide the control necessary to ensure that future violations will not occur.

4. The Date When Full Compliance Will Be Achieved

Full compliance for the missing welds was achieved in November, 1993, with the completion of the Design Change Backup Forms.

RII-93-25-02:

CP&L's Robinson Technical Specification in Section 6.5.1, procedures, tests, and experiments, requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

CP&L's Robinson Maintenance Management Procedure No. MMM-028, Control of Field Issued Material, requires the following:

- Section 5.4.1.1- This number (Purchase Order Number) is the primary identification for traceability of most material used.
- Section 5.4.1.2- All identification transfer operations shall include the transfer of this number (Purchase Order Number) unless authorized otherwise by Maintenance or Modification Implementation Unit (MIU) Supervision.
- Section 5.9.2- Maintenance and MIU Supervision shall ensure that the proper material is used and installation documents are properly marked to indicate the job on which the material was installed.

Contrary to the above, the purchase order number marked on pipe clamps on the east side of Pipe Support FW-7-33C (Special Support SS-2233) was different than the number recorded in the document signed off by the installer and the QC Inspector.

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described.

Investigation into the cause of this condition indicates that the parts in question had the Warehouse issued tags attached to them from the time that they were issued from the Warehouse up until the time the painting process began. While it cannot be conclusively determined, it is believed that the tags were removed for painting but were inadvertently switched and reattached after painting was completed. The incorrect tags then remained attached to the supports until the time of installation, which was approximately six days apart. Therefore, the conclusion of the investigation was that the tags were switched and re-attached incorrectly after the painting was completed. As a result, the clamp for SS-2230 was stenciled incorrectly, and the clamp for SS-2233 was used because the tag from the Warehouse indicated that the material was from Purchase Order Number 7G0046.

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

An investigation was initiated, and the root cause of this violation was identified. Adverse Condition Report 93-230 documents the results of this investigation. The purchase order number on the clamp for SS-2230 was corrected, and the clamps were relocated to their correct location. Other supports were inspected and no discrepancies were noted.

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

In order to preclude recurrence of this violation, current painting processes will be revised to ensure proper traceability of parts is maintained when disassembly is required.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with implementation of the above corrective action by March 31, 1994.