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SUBJECT: Submits supplementary response re revision to QA program.
 Indicated exceptions & provides alternatives to requirements.

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Carolina Power & Light Company

December 6, 1979

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Office of Nuclear Reactor Regulation
ATTENTION: Mr. A. Schwencer, Chief
Operating Reactors Branch, No. 1
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REVISION TO QUALITY ASSURANCE PROGRAM

Dear Mr. Schwencer:

CP&L letters dated August 12, 1974, September 9, 1975, March 30, 1977, June 22, 1977, and September 14, 1977 submitted a description of the Operations Quality Assurance Program for the Robinson Steam Electric Plant, Unit No. 2. This letter is submitted to indicate additional exceptions to ANSI N45.2.4 "Installation, Inspection, and Testing Requirements of Instrumentation & Electrical Equipment During the Construction (Operations) of Nuclear Power Generating Stations", and ANSI N45.2.8, "Supplementary Quality Assurance Requirements for Installation, Inspection, and testing of Mechanical Equipment and Systems for the Construction (Operation) Phase of Nuclear Power Plants", and to provide alternatives to the requirements therein.

ANSI N45.2.4-1972, as referenced by Safety Guide 30, 8/11/72, to which CP&L has committed, requires the following:

Paragraph 2.5.2, "Calibration Control", states in part "...and equipment suitably marked to indicate date of next required calibration."

Paragraph 6.2.1, "Equipment Test", states in part "...requiring calibration shall be tagged or labeled on completion indicating date of calibration and identity of person that performed the calibration."

Additionally, ANSI N45.2.8, Draft 3, Rev. 3-April 1974, "Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction (Operation) Phase of Nuclear Power Plants", to which CP&L has previously committed, requires the following:

Paragraph 2.8.2, "Calibration Control", states in part "...equipment suitably marked so that calibration status can be determined."

In addition to the exceptions previously taken to ANSI N45.2.4 and ANSI N45.2.8, CP&L wishes to take exception to those portions of the paragraphs listed above and provide the following alternative:

Portable items of measuring and test equipment and reference standards shall be tagged or labeled indicating the date of calibration, identity of person performing calibration, and date of recalibration. These items are in a calibration program which requires recalibration on a specified frequency or, in certain cases, prior to use.

Instrumentation and electrical equipment in the categories of (1) instruments installed as listed in the Technical Specifications, (2) installed instrumentation used to verify Technical Specification parameters, and (3) installed safety-related instruments and electrical equipment that provide an active function during operation or during shutdown; i.e., vice being designated safety related solely because the instrument is an integral part of a pressure retaining boundary, shall be in a calibration program. This program provides, by the use of status cards, computer schedules, or tags, for the date that recalibration is due and indicates the status of calibration. The identity of person(s) performing calibration is provided on the calibration documents.

These exceptions and alternatives provide the necessary controls to comply with (1) 10CFR50, Appendix B, Criterion XII, "Control of Measuring & Test Equipment", which requires these devices to be calibrated and adjusted at specified periods to maintain accuracy within necessary limits, and Criterion XIV, "Inspection, Test and Operating Status", which states "...measures to be established which indicate by the use of markings such as stamps, tags, labels, routing cards, or other suitable means the status of inspections and tests performed upon individual items of the nuclear power plant..." (2) ANSI N18.7-1976, paragraph 5.2.16, "Measuring and Test Equipment", which states "Equipment shall be suitably marked to indicate calibration status."

Commencing with the date of this letter, CP&L shall provide for the calibration of M&TE as indicated in the alternatives proposed in this letter, unless otherwise notified.

In our letter of September 9, 1975, page 12, we committed to comply with the requirements of Regulatory Guide 1.88 (August 1974) which endorses ANSI N45.2.9-1974 for Collection, Storage, and Maintenance of QA Records at Robinson 2, with the following clarifications:

1. N45.2.9, Section 5.6, states: "Permanent and temporary record storage facilities shall be constructed or located as to protect contents from possible destruction by causes such as fire, flooding, tornadoes, insects, rodents, and from possible deterioration by a combination of extreme variations in temperature and humidity conditions." Currently, QA records are stored in both working files at various locations throughout the plant and in the storage vault which is located in the administration building. The records stored in the vault are kept in both fireproof file cabinets which have a one-hour fire rating and non-fireproof fire containers.

The administration building has been constructed in accordance with standard building codes and is considered to afford adequate protection from most natural causes. Protection against possible flooding conditions will be provided by evacuation of vital quality assurance records. Protection against destruction of records by insects or rodents will be provided through standard pest control measures. To minimize the fire danger to the vault, the following measures have been taken: No smoking is allowed in the vault, access to the vault is controlled, and the vault is kept locked at all times except while in actual use.

2. ANSI N45.2.9, Section 5.6, indicates that records should be afforded the equivalent of a National Fire Protection Association (NFPA) Class A four-hour minimum rated facility.

The storage vault does not meet the requirements for a four-hour facility. It is constructed of 8-inch hollow, insulation fill concrete block walls with a 4-inch concrete slab floor and a 3-inch noncombustible roof deck covered with tar and gravel and supported by noninsulated steel roof joists. The vault has no windows and one door which is a 1½-hour UL rated fire door. The heat and ventilation system consists of forced air supplied through overhead ducts and a heat sensitive, automatic closing exhaust damper.

To upgrade the QA records storage and maintenance provisions, the following actions are being taken:

- a. The storage vault will be equipped with a Halon 1301 automatic total flooding fire protection system. This system will satisfy all of the applicable requirements of NFPA No. 12A-1973.
- b. Both the HVAC supply and exhaust ducts will be equipped with dampers which will automatically close in the event the Halon 1301 system discharges.
- c. The roof joists in the storage vault will be coated with a protective thermal insulation material.

- d. Selected QA records will be microfilmed in duplicate with one copy stored in the vault and the other copy retained at a remote location.
- e. As QA records are generated, they will be stored in one-hour UL rated fireproof file cabinets at the work locations until microfilmed or stored in the vault.

Procedures will be developed and implemented to cover the above items.

The schedule for completion of the above program is as follows:

- a. The Halon 1301 system is scheduled to be installed by October, 1976.
- b. The automatic closure dampers for the storage vault will be installed in the HVAC system concurrently with the Halon 1301 system.
- c. Thermal insulation of the vault roof joists is scheduled to be installed by December 31, 1975.
- d. Microfilming of existing QA records is scheduled to be initiated by February 1, 1976.
- e. The use of one-hour UL rated fireproof file cabinets at work locations will be instituted concurrently with the microfilming operation.

CP&L wishes to restate our position on Regulatory Guide 1.88 (August 1974) as listed below:

The requirements for collection, storage, and maintenance of QA records at Robinson 2 will be in accordance with ANSI N45.2.9-1974 subject to the following:

- 1. N45.2.9, Section 5.6, states: "Permanent and temporary record storage facilities shall be constructed or located as to protect contents from possible destruction by causes such as fire, flooding, tornadoes, insects, rodents, and from possible deterioration by a combination of extreme variations in temperature and humidity conditions." Currently, QA records are stored in both working files at various locations throughout the plant and in the storage vault which is located in the administration building.

The administration building has been constructed in accordance with standard building codes and is considered to afford adequate protection from most natural causes. Protection against destruction of records by insects or rodents will be provided through standard pest control measures. To minimize the fire danger to the vault, the following measures have been taken: No smoking is allowed in the vault and access to the vault is controlled.

2. ANSI N45.2.9, Section 5.6, indicates that records should be afforded the equivalent of a National Fire Protection Association (NFPA) Class A four-hour minimum rated facility.

The storage vault does not meet the requirements for a four-hour facility. It is constructed of 8-inch hollow, insulation fill concrete block walls with a 4-inch concrete slab floor and a 3-inch noncombustible roof deck covered with tar and gravel and supported by noninsulated steel roof joists. The vault has no windows and one door which is a 1½-hour UL rated fire door. The heat and ventilation system consists of forced air supplied through overhead ducts and a heat sensitive, automatic closing exhaust damper.

To upgrade the QA records storage and maintenance provisions, the following actions were taken:

- a. The storage vault has been equipped with a Halon 1301 automatic total flooding fire protection system. This system satisfies all of the applicable requirements of NFPA No. 12A-1973.
- b. Both the HVAC supply and exhaust ducts have been equipped with dampers which will automatically close in the event the Halon 1301 system discharges.
- c. The roof joists in the storage vault have been coated with a protective thermal insulation material.
- d. Selected QA records will be microfilmed in duplicate with one copy stored in the vault and the other copy retained at a remote location.
- e. As QA records are generated, they will be stored in one-hour UL rated fireproof file cabinets at the work locations until microfilmed or stored in the vault.

Procedures have been developed and implemented to cover the above items.


Mr. A. Schwencer

The statement concerning protection against possible flooding conditions is being deleted based on Section 2.6.1 of the H. B. Robinson FSAR which states in part, "...Flooding at the plant will not occur since the plant grade is above the maximum lake level..."

The other changes made are to update our commitments to existing conditions at the plant.

Commencing with the date of this letter, CP&L shall use the positions stated in this letter for collection, storage, and maintenance of H. B. Robinson QA records, unless otherwise notified.

Yours very truly,



E. E. Utley

Executive Vice President
Power Supply & Customer Services

WJD/CER:cp*

cc: Messrs. J. N. Hannon
T. A. Ippolito
J. D. Neighbors