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SUBJECT: Submits proposed change to QA program. Proposed change will revise commitment re collection & maint of QA records from ANSI N45.2.9-1974 to ANSI N45.2.9-1979 & reduce required fire rating of QA record storage facility.

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R. B. STARKEY, JR.
Vice President
Nuclear Services Department

MAR 23 1993

SERIAL: NLS-93-086

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

CHANGES TO QA PROGRAM COMMITMENT

Gentlemen:

The purpose of this letter is to submit, pursuant to 10 CFR 50.53(a)(3), a proposed change to the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) Quality Assurance (QA) program. This change will, when approved, result in a reduction in a previously approved commitment.

The proposed change will revise the HBR2 commitment regarding the collection and maintenance of QA records from ANSI N45.2.9-1974 to ANSI N45.2.9-1979. This change will reduce the required fire rating of the QA record storage facility from a four-hour rating recommended in ANSI N45.2.9-1974 to a two-hour rating required by ANSI N45.2.9-1979. A discussion of the change pursuant to the requirements of 10 CFR 50.54(a)(3)(ii) is included as Attachment 1. The proposed changed FSAR pages are included as Attachment 2.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,

R. B. Starkey, Jr.

JSK/jbw

Attachments

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
Ms. B. L. Mozafari

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(1967RNP)

DISCUSSION OF PROPOSED CHANGE

Proposed Change

The proposed change will revise the HBR2 commitment regarding to collection and maintenance of QA records from ANSI N45.2.9-1974 to ANSI N45.2.9-1979. The records to be maintained, however, will continue to be those listed in Appendix A of the 1974 Standard. A description of HBR2 compliance to the 1979 Standard is contained in Attachment 2. The proposed change also deletes reference to Regulatory Guide 1.88 on FSAR page 17.2.17-1, since Regulatory Guide 1.88 has been withdrawn.

Reason for Change

Plans are currently being formulated to build a new Administrative Services building at HBR2. Included in those plans is the construction of a Quality Assurance record storage facility. Under the present commitment to ANSI N45.2.9-1974 the storage facility would be designed to meet a recommended four-hour fire rating with respect to structure, doors, frames, and hardware. The proposed change to the 1979 edition of the Standard changes the fire rating requirement to two-hours and will result in considerable savings to Carolina Power & Light Company.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10 CFR 50 Appendix B and the FSAR Quality Program

The proposed change meets the requirements of 10 CFR 50 Appendix B since the only Appendix B Criterion affected is XVII which addresses certain operating records, the results of tests and inspections, and the necessity for retrievability, retention, location of stored records, and assigned responsibility. The proposed change has no adverse impact on any of those requirements. The commitment to ANSI N45.2.9-1979 notwithstanding, HBR2 will continue to conform to the recommendations contained in ANSI N45.2.9-1974, Appendix A with respect to record retention.

Regulatory Guide 1.88

COLLECTION, STORAGE AND MAINTENANCE
OF NUCLEAR POWER PLANT QA RECORDS
(AUGUST, 1974)

ANSI Standard N45.2.9-1974

COLLECTION, STORAGE, AND MAINTENANCE
OF QA RECORDS

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

- a) Section 5.4, Item 2 Loose Records: HBR complies with this requirement except for short periods of time during the microfilming process.
- b) Section 5.6 states: "Permanent and temporary records storage facilities shall be so 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."

QA records are stored in permanent and temporary facilities as follows:

- 1) One hour UL-rated fireproof file cabinets are utilized for temporary storage of records. These file cabinets are located at work stations throughout the plant and will contain the records until transmitted to the vault.
 - 2) Permanent storage of QA records will be in the plant vault constructed to meet the requirements of this ANSI Standard.
 - 3) Selected records may be stored off site by a QA Records Storage supplier, provided that supplier meets the applicable sections of this ANSI Standard.
- c) ANSI N45.2.9, Section 5.6 states: "Structure, doors, frames, and hardware should be Class A fire-rated with a recommended four-hour minimum rating." The reinforced concrete vault structure has 18" thick walls and a 15" thick roof which encompasses the minimum thickness requirements of 8" for reinforced concrete as required by NFPA 232-1980. However, seals for penetrations through walls designed to provide fire protection in excess of three hours are not available. Doors and hardware are also not available having a four-hour rating and meeting the pressure differential from a Region I design basis tornado. Doors for the vault are designed and constructed to withstand the pressure differential of a Region I tornado and meet the requirements for a three-hour fire.

INSERT NEW PAGE 1.8.0-14

17.2.17 QUALITY ASSURANCE RECORDS

The Corporate QA Program establishes requirements for the identification, collection, and storage of QA records.

The program requires that sufficient records be maintained to provide documentary evidence of the quality of items and the accomplishment of activities affecting quality. Records to be maintained as QA records include those listed in Appendix A of ANSI N45.2.9-1974, ~~with exceptions as noted in CP&L's position on Regulatory Guide 1.88~~ and Section 6 of the NRC approved Technical Specification for the plant.

Records are identifiable and retrievable through the use of indexes and filing systems, which are required by the program.

These records are controlled in accordance with the Plant Operating Manual which requires procedures for the collection, maintenance, and protection. Procedures are required to be developed to indicate responsibilities and retention periods.

The QA Program requires inspection and test records to contain the following, where applicable:

- a) A description of the type of observation
- b) Evidence of completing and verifying a manufacturing, inspection, or test operation
- c) Date and results of the inspection or test
- d) Information related to condition adverse to quality
- e) Inspection or data recorder identification
- f) Evidence as to the acceptability of the results

The records are maintained within structures designed to prevent destruction, deterioration, or theft. These facilities ensure protection against destruction by fire, flooding, theft, and deterioration by the environmental conditions of temperature and humidity.

The Corporate QA Program requires access control to the records storage facilities.

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PROPOSED CHANGED FSAR PAGES

Regulatory Guide 1.88 (WITHDRAWN)

ANSI Standard N45.2.9-1979 REQUIREMENTS FOR COLLECTION, STORAGE, AND
 MAINTENANCE OF QUALITY ASSURANCE RECORDS FOR
 NUCLEAR POWER PLANTS

The requirements for collection, storage, and maintenance of QA records at HBR Unit 2 will be in accordance with ANSI N45.2.9-1979, subject to the following:

a) Section 1.5 titled Referenced Documents:

CP&L's commitment to other documents referenced in this standard shall be as stated in our commitment to that document.

b) Section 5.4 Item 2 "Records shall be firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets or on shelving in containers." HBR complies with this requirement except for brief periods when records are in the receipt or microfilming process.

c) Section 5.6 states: "Records shall be stored in facilities constructed and maintained in a manner which minimizes the risk of damage or destruction from the following:

1. Natural disasters such as winds, floods, or fires.
2. Environmental conditions such as high and low temperatures and humidity.
3. Infestation of insects, mold, or rodents."

Records are stored in permanent and temporary facilities as follows:

1. One-hour UL-rated fireproof file cabinets are utilized for temporary storage of records. These file cabinets are located at work locations throughout the plant and will contain the records until transmitted to the vault.
 2. Permanent storage of QA records will be in the plant vault constructed to meet the requirements of this ANSI standard.
 3. Selected records may be stored off-site by a QA Records Storage supplier provided that supplier meets the applicable sections of this ANSI standard.
- d) Section 6.2 states: Storage systems shall provide for retrieval of information in accordance with planned retrieval times based upon the record type.

Retrieval of records at the H. B. Robinson Plant is via a random access computer system using keywords and document identification numbers. Or through a manual index for records completed prior to 1982. The manual system is keyed to Plant Systems.

Section 7.3.3 states: "Various regulatory agencies have requirements concerning records that are within the scope of this Standard. The most stringent requirements shall be used in determining the retention period."

H. B. Robinson will continue to adhere to the recommendations of Appendix A of ANSI N45.2.9-1974, or with the most stringent requirement with respect to records retention.

HBR2

UPDATED FSAR

17.2.17 QUALITY ASSURANCE RECORDS

The Corporate QA Program establishes requirements for the identification, collection, and storage of QA records.

The program requires that sufficient records be maintained to provide documentary evidence of the quality of items and accomplishment of activities affecting quality. Records to be maintained as QA records include those listed in Appendix A of ANSI N45.2.9-1974 and Section 6 of the NRC approved Technical Specifications for the plant. Exceptions are noted on CP&L's position on ANSI N45.2.9-1979.

Records are identifiable and retrievable through the use of indexes and filing systems, which are required by the program.

These records are controlled in accordance with the Plant Operating Manual which requires procedures for the collection, maintenance, and protection. Procedures are required to be developed to indicate responsibilities and retention periods.

The QA Program requires inspection and test records to contain the following, where applicable:

- a) A description of the type of observation
- b) Evidence of completing and verifying a manufacturing, inspection or test operation
- c) Date and results of the inspection or test
- d) Information related to condition adverse to quality
- e) Inspector or data recorder identification
- f) Evidence as to the acceptability of the results

The records are maintained within structures designed to prevent destruction, deterioration, or theft. These facilities ensure protection against destruction by fire, flooding, theft, and deterioration by the environmental conditions of temperature and humidity.

The Corporate QA Program requires access control to the records storage facility.

17.2.17-1

Amendment No.

(1967RNP)