

## DISTRIBUTION AFTER ISSUANCE OF OPERATING LICENSE

NRC FORM 195

(2-76)

U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER

50-261

## NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

DATE OF DOCUMENT

9-14-77

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9-20-77

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TO: R-W Reid

FROM:

Carolina Pwr & Light Co  
Raleigh, NC  
E E Utley☒ LETTER☐ NOTORIZED

PROP

INPUT FORM

☒ ORIGINAL☒ UNCLASSIFIED☐ COPY

## DESCRIPTION

Request that ANSI-N18.7-1976 replace  
ANSI-N18.7-1972 ith regard to the actual  
"Operational Phase" of administrative controls  
and quality assurance programs.....

2p

## ENCLOSURE

PLANT NAME:

Robinson

9-20-77 . . ehf

## SAFETY

## FOR ACTION/INFORMATION

BRANCH CHIEF: (7)

Reid

## INTERNAL DISTRIBUTION

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Carolina Power & Light Company

September 14, 1977

REGULATORY DOCKET FILE COPY

FILE: 2510 (R)

SERIAL: OQA-77-78

Mr. Robert W. Reid, Chief  
Operating Reactors Branch No. 4  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

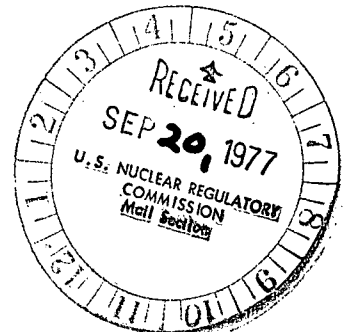
RE: H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
ANSI STANDARDS

Dear Mr. Reid:

Carolina Power & Light Company feels that ANSI-N18.7-1976 reflects the actual "Operational Phase" of administrative controls and quality assurance programs by which we operate. We therefore request that previous commitments made by CP&L to ANSI-N18.7-1972 be deleted and ANSI-N18.7-1976 be inserted in its place.

ANSI-N18.7-1976, Section 4.5, next to last paragraph states, "Periodic review of the audit program shall be performed by the independent review body or by a management representative at least semiannually to assure that audits are being accomplished in accordance with requirements of technical specifications and of this Standard." CP&L's Corporate Quality Assurance Audit Section is an independent section that monitors all other review and audit sections within our organization. Each Corporate Quality Assurance Audit Section audit report is reviewed by our Executive Vice President and Chief Operating Officer. The Manager of the Corporate Quality Assurance Audit Section also briefs the Executive Vice President and Chief Operating Officer quarterly on CQAA activities. CP&L feels that these management reviews stated satisfy the requirements of the above paragraph.

ANSI-N18.7-1976 references many standards. Among these standards are ANSI-N18.1-1971 and ANSI-N45.2.8-1975. CP&L wishes to maintain its position on ANSI-N18.1 as referenced in the letter to Mr. Robert W. Reid dated September 9, 1975 from Mr. E. E. Utley. CP&L's position on ANSI-N45.2.8 can be restated as follows:



336 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

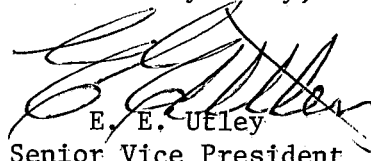
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September 14, 1977

Within the context of established Operation and Maintenance QA Program, the applicable guidance contained in ANSI-N45.2.8-1975 will be utilized in relation to mechanical maintenance or modification with the following exception--ANSI-N45.2.8-1975, Section 6, states, in part, "Procedures shall be established for processing inspection and test data and their analysis, evaluation, and final acceptance." At H. B. Robinson Unit 2, data processing procedures per se have not been developed; instead, test data is recorded, processed, analyzed, and accepted in accordance with procedures and instructions in appropriate functional areas; e.g., maintenance, start-up, etc.

Carolina Power & Light Company's position on previous commitments as stated in the letters of February 27, 1975; August 26, 1975; and September 11, 1975, other than the above, remains unchanged. Your concurrence in the above is requested, with implementation within 90 days thereafter.

Yours very truly,

  
E. E. Utley  
Senior Vice President  
Power Supply

CHM/gsm