

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: k9394

FILE: _____

FROM: Carolina Power & Light Co. Raleigh, N.C. 28602 E.E. Utley		DATE OF DOC 9-9-75	DATE REC'D 9-12-75	LTR XX	TWX	RPT	OTHER XX
TO: Mr. Robert W. Reid		ORIG 1 signed	CC	OTHER	SENT NRC PDR SENT LOCAL PDR		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-261		

DESCRIPTION: Ltr re our 6-27-75 ltr....trans the following:

ENCLOSURES: Addl info on Quality Assurance Program for H.B. Robinson Unit 2 in accordance with App. B to ~~EX~~ 10CFR Part 50
(1 cys encl recd)

PLANT NAME: H.B. Robinson Unit 2

Do Not Remove
ACKNOWLEDGED

FOR ACTION/INFORMATION

DHL 9-16-75

BUTLER (L) W/ Copies	SCHWENCER (L) W/ Copies	ZIEMANN (L) W/ Copies	REGAN (E) W/ Copies	✓ REID (L) W/ 4 COPIES
CLARK (L) W/ Copies	STOLZ (L) W/ Copies	DICKER (E) W/ Copies	LEAR (L) W/ Copies	
PARR (L) W/ Copies	VASSALLO (L) W/ Copies	KNIGHTON (E) W/ Copies	SPIES W/ Copies	
KNIEL (L) W/ Copies	PURPLE (L) W/ Copies	YOUNGBLOOD (E) W/ Copies	LPM W/ Copies	

INTERNAL DISTRIBUTION

REG FILE ✓ NRC PDR ✓ OGC, ROOM P-506A ✓ GOSSICK/STAFF (LTR) ✓ CASE (LTR) ✓ GIAMBUSSO ✓ BOYD ✓ MOORE (L) ✓ DEYOUNG (L) ✓ SKOVHOLT (L) (LTR) ✓ GOLLER (L) (LTR) ✓ P. COLLINS ✓ DENISE ✓ REG OPR ✓ FILE & REGION (2) ✓ MIPC	TECH REVIEW ✓ SCHROEDER ✓ MACCARY ✓ KNIGHT ✓ PAWLICKI ✓ SHAO ✓ STELLO ✓ HOUSTON ✓ NOVAK ✓ ROSS ✓ IPPOLITO ✓ TEDESCO ✓ J. COLLINS ✓ LAINAS ✓ BENAROYA ✓ VOLLMER (2)	DENTON GRIMES GAMMILL KASTNER BALLARD SPANGLER ✓ ENVIRO ✓ MULLER ✓ DICKER ✓ KNIGHTON ✓ YOUNGBLOOD ✓ REGAN (2) ✓ PROJECT LDR ✓ BAJWA (2) ✓ HARLESS	LIC ASST R. DIGGS (L) H. GEARIN (L) E. GOULBOURNE (L) P. KREUTZER (E) J. LEE (L) M. RUZHBRUK (L) S. REED (E) M. SERVICE (L) S. SHEPPARD (L) M. SLATER (E) H. SMITH (L) S. TEETS (L) G. WILLIAMS (E) V. WILSON (L) ✓ R. INGRAM (L) (LTR) ✓ M. DUNCAN (E)	A/T IND BRAITMAN SALTZMAN MELTZ PLANS MCDONALD CHAPMAN DUBE (Ltr) E. COUPE PETERSON HARTFIELD (2) KLECKER EISENHUT WIGGINTON ✓ PATTON - OG C
--	---	---	---	--

EXTERNAL DISTRIBUTION

✓ - LOCAL PDR <u>Hartville, S.C.</u>	1 - NATIONAL LABS	1 - PDR-SAN/LA/NY
✓ - TIC (ABERNATHY) (1)(2)(10)	1 - W. PENNINGTON, Rm E-201 GT	1 - BROOKHAVEN NAT LAB
✓ - NSIC (BUCHANAN)	1 - CONSULTANTS	1 - G. ULRIKSON ORNL
✓ - ASLB	NEWMARK/BLUME/AGBABIAN	
✓ - Newton Anderson		
✓ 16 ACRS <u> </u> /SENT		



Carolina Power & Light Company

Regulatory Docket File

September 9, 1975

50-261

FILE: NG-3514 (R)

SERIAL: NG-75-1337

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

Dear Mr. Reid:

H. B. ROBINSON UNIT NO. 2
LICENSE DPR-23
QUALITY ASSURANCE PROGRAM



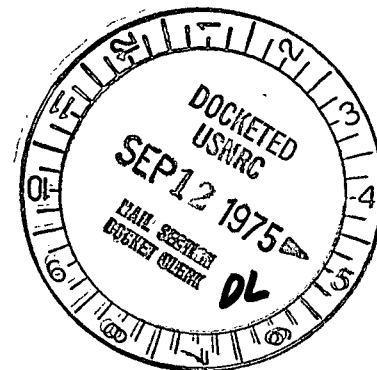
This letter is in response to Mr. George Lear's letter of June 27, 1975, requesting additional information on the Quality Assurance Program for H. B. Robinson Unit No. 2. The enclosed information is submitted for your review and is intended to demonstrate compliance with Appendix B to 10CFR Part 50.

Yours very truly,

E. E. Utley
Vice President
Bulk Power Supply

EEU/kr
Enclosure

cc: Messrs. H. R. Banks
N. B. Bessac
P. W. Howe
R. E. Jones
W. B. Kincaid
M. A. McDuffie
J. B. McGirt
G. McGovern
E. E. Utley



9394

9-9-75

NRC

- 410.1 Identify the highest level of management within the CP&L
(I) organization responsible for establishing Robinson QA policies, goals, and objectives.

CP&L

The Executive Vice President - Engineering, Construction and Operation Group is responsible to the President for establishing Robinson 2 QA policies, goals, and objectives by policy statements and the Corporate Quality Assurance Program. He operates through five departments to provide for all QA functions and operations activities for Robinson 2. He arranges, through the Finance Group, for purchasing services in support of Robinson 2. He approves Part 2 of the Corporate Quality Assurance Program and revisions thereto.

NRC

410.2 Identify the level of management having the overall authority
(I) and responsibility for the Robinson Operational QA Program.

CP&L

The Vice President - Bulk Power Supply (BPS) has overall authority and responsibility for the implementation and effectiveness of the Operation and Maintenance Quality Assurance Program part of the Corporate Quality Assurance Program at Robinson 2. He has assigned this responsibility to the Manager - Nuclear Generation. The Manager-Nuclear Generation delegates the authority for implementation and direction of the plant QA activities to the Robinson 2 Plant Manager.

NRC

- 410.3
(I) Describe measures which assure that the authority and independence of the individual responsible for managing the Robinson QA Program is such that he can effectively direct and control the QA/QC program and is independent from schedules.

CP&L

The QA Supervisor has the authority and responsibility for managing the Robinson 2 QA Program. He is independent of undue influences and responsibilities for schedules and costs so that he can effectively direct and control the Robinson 2 QA Program. The QA Supervisor is free from non-related duties or responsibilities, thus permitting him to give full attention to assuring that the QA program at Robinson 2 is being effectively implemented.

NRC

- 410.4 Describe the interface lines of authority and responsibility
(I) between the Robinson Plant Manager and the Power Plant
Engineering Department relative to QA matters.

CP&L

There are not any interface lines of authority and responsibility between the Robinson 2 Plant Manager and the Power Plant Engineering Department relative to QA matters. Only a line of communication is established between the Robinson 2 Plant Manager and other departments. Requests for QA assistance are made by the Plant Manager to the Manager - Nuclear Generation Section and the Manager - BPS Quality Assurance who have responsibility and authority for interfacing with other departments.

NRC

- 410.6 (I) Provide measures which assure that the "onsite" Engineering and QA Supervisor has sufficient authority and responsibility to communicate and interface with the "offsite" QA Section Manager of Bulk Power Supply relative to QA matters.

CP&L

Under the requirements of the Corporate QA Manual, the QA Supervisor, under the direction of the Plant Manager, is responsible for among other things:

1. Initiating requests through the Plant Manager for QA assistance from the Manager - Nuclear Generation and Manager - BPS Quality Assurance.
2. Reporting results of surveillance of the plant to the Manager - BPS Quality Assurance.
3. Reporting quality-related problems through the Plant Manager to the Manager - BPS Quality Assurance, when nonplant action is necessary.

The required authority and responsibility is established in plant QA manuals and procedures for the QA Supervisor to communicate and interface with the Manager - BPS Quality Assurance.

NRC

410.5 Describe how resolutions to unresolved QA problems between the
(I) Power Plant Engineering Department, Special Services Department,
and the Bulk Power Supply Department are accomplished.

CP&L

The initial responsibility for accomplishing resolution of unresolved QA problems between the Power Plant Engineering, Special Services, and Bulk Power Supply Departments lies with appropriate section managers under whose cognizance the problem arises. If these section managers are unable to obtain resolution, then the problem is communicated to the Vice President - Power Plant Engineering Department, the Manager-Special Services Department, and the Vice President - Bulk Power Supply Department. These department heads have the final responsibility to obtain satisfactory resolution of QA problems.

NRC

- 410.7 (I) Describe the CP&L qualification requirements for personnel performing inspection operations, and describe in more detail the provisions which assure that the inspectors are independent of the individual or group directly responsible for performing the specific activity.

CP&L

The qualification of Robinson 2 inspection, examination, and testing personnel will be in accordance with ANSI N45.2.6-1973 subject to the following:

1. N45.2.6 Sections 2.2.4, 3.1, and 3.2.2 - Only personnel performing NDE (PT, MT, UT, and RT) will be grouped in levels of capability and certified as such. Personnel performing NDE will be qualified in accordance with SNT-TC-1A, its supplements and appendices. For other inspections, personnel are certified for implementing inspections, review and evaluation of inspection data and reporting of inspection and test results.
2. N45.2.6 Section 3.2.1 - Potential employees are required to receive a complete examination to assure satisfactory physical condition, but annual physical examinations are not required.

The near vision acuity of inspection, examination, and testing personnel will be checked annually by using the standard Jaeger's type chart or equivalent test type.

3. N45.2.6 Section 2.2.4 - The general education and experience of personnel performing inspections, tests, and examinations at Robinson 2 are documented and available for review.

Plant QA Manual provides that personnel engaged in or responsible for repair or installation of an item, or for conducting a process, shall not perform the corresponding QA inspection or witnessing.

NRC

410.8
(II)

Describe CP&L's commitment for Robinson 2 to comply with the guidelines contained in WASH-1283, "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants," Revision 1, (May 24, 1974), WASH-1309, "Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants," (May 10, 1974), and WASH-1284, "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants," or describe acceptable alternatives to the guidance contained in these documents in equivalent detail.

CP&L

For all but three of the standards referenced in the above WASH documents, the NRC has issued regulatory guides on each standard singularity and separately. The following commitments are made to the guidance contained in the regulatory guides.

Where specific commitment is not made to an individual regulatory guide position or ANSI Standard paragraph, then CP&L shall comply with the applicable guidance. The applicability of the guidance contained in ANSI standards to work that falls under the Robinson 2 Operation and Maintenance QA Program shall be determined, reviewed, and approved by supervisory and management personnel. Additionally, this requirement applies to the Brunswick Operation and Maintenance QA Program. Robinson 2 plant procedures and instructions, which are included in whole or in part into the Robinson 2 Plant Operating Manual, are designed to meet the applicable guidance delineated in regulatory guides which endorse those standards included in WASH 1284, 1309, and 1283; and in draft standards N45.2.8, N45.2.12, and N45.2.13 included in WASH 1284, 1309, and 1283. However, each and every individual requirement is not spelled out verbatim. This is specifically true where standards detail "common sense" or "good practice" requirements which are understood and practiced by experienced personnel appropriately trained and qualified for the task at hand.

The following positions are based on previous QA commitments and the present structure of the CP&L approved Robinson 2 Operation and Maintenance QA Program.

1. Regulatory Guide 1.8 (March, 1971) - "Personnel Selection and Training"
Endorses ANSI N18.1

NRC

"The criteria for the selection and training of nuclear power plant personnel contained in ANSI N18.1, "Proposed Standard for Selection and Training of Personnel for Nuclear Power Plant," dated June 22, 1970, are generally acceptable and provide an adequate basis for the selection and training of nuclear power plant personnel. In some cases, plant design features or unusual operating conditions may indicate that additional or more specialized expertise is needed. This determination will be made on an individual case basis."

CP&L

The criteria for selection and training of personnel for operation of Robinson 2 is addressed in the Robinson 2 Technical Specifications.

2. Regulatory Guide 1.30 (August, 1972) - "Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment" - Endorses ANSI N45.2.4-1972

NRC

"The requirements for the installation, inspection, and testing of nuclear power plant instrumentation and electric equipment which are included in ANSI N45.2.4-1972, "Installation, Inspection, and Testing Requirements for Instrumentation and Electrical Equipment During the Construction of Nuclear Power Generating Stations" (also designated by IEEE Std. 336-1971) are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

CP&L

The installation, inspection, and testing of nuclear power plant instrumentation and electrical equipment at Robinson 2 will be in accordance with the applicable guidance of ANSI N45.2.4-1972 with the following exception--ANSI N45.2.4, Section 7 states, in part, "Procedures shall be established for processing inspection and test data and their analysis and evaluation." At Robinson 2 data processing procedures per se have not been developed; instead, test data is recorded, processed, and analyzed in accordance with procedures and instructions in appropriate functional areas, e.g., maintenance, startup, etc.

3. Regulatory Guide 1.33 (November, 1972) - "Quality Assurance Program Requirements (Operation)" - Endorses ANSI N18.7-1972

NRC

"The requirements and recommendations for administrative controls necessary for safe and efficient operation of nuclear power plants included in proposed standard ANS-3.2, "Standard for Administrative Controls for Nuclear Power Plants," dated November 2, 1972, and the general requirements and guidelines for establishing and executing a quality assurance program during the operation phase of nuclear power plants included in ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants," are generally acceptable and provide an adequate basis for complying with the quality assurance program requirements of Appendix B to 10CFR Part 50.

"ANSI N45.2-1971 and ANS-3.2 require the preparation of many procedures to carry out an effective quality assurance program. Appendix A to this safety guide, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," should be used as guidance to assure minimum procedural coverage for plant operating activities, including related maintenance activities. Appendix A does not provide a complete listing of needed procedures since many other activities that are carried out during the operation phase of a nuclear power plant require written procedures that are not included in Appendix A. The procedures listed in Appendix A may be combined or separated to conform to the applicant's procedures plan."

CP&L

The CP&L Operation and Maintenance Quality Assurance Program essential for Robinson 2 is in accordance with ANSI N45.2-1971 and N18.7-1972 (previously endorsed as draft standard ANS-3.2). The administrative controls necessary for the safe and efficient operation of Robinson 2 were developed using the guidelines of N18.7-1972, ANSI N45.2-1971, and Appendix A of Regulatory Guide 1.33.

4. Regulatory Guide 1.37 (March, 1973) - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants" - Endorses ANSI N45.2.1-1973

NRC

"The requirements and recommendations for on-site cleaning of materials and components, cleanliness control, and preoperational cleaning and layup of water-cooled nuclear power plant fluid systems that are included in ANSI N45.2.1-1973, "Cleaning of Fluid Systems and Associated Components During the Construction Phase of Nuclear Power Plants," are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

Regulatory Guide 1.37 (continued)

CP&L

Those areas of the Operation and Maintenance Quality Assurance Program applicable to on-site cleaning of materials and components, cleanliness control, and preoperation cleaning and layup of Robinson 2 fluid systems, will be in accordance with ANSI N45.2.1-1973. At Robinson 2 a classification system similar to ANSI N45.2.1-1973 has been developed and is fully implemented for cleaning of fluid systems.

5. Regulatory Guide 1.38 (March, 1973) - "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants" - Endorses ANSI N45.2.2-1972

a. NRC

"The requirements and guidelines for packaging, shipping, receiving, storage, and handling of water-cooled nuclear power plant items that are included in ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants During the Construction Phase," are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

CP&L

Packaging, shipping, receiving, storage, and handling of Robinson 2 items are in accordance with applicable guidance of ANSI N45.2.2-1972 with the following specific exception :

Subdivision 2.7 of ANSI N45.2.2-1972 states, in part, that, "requirements for activities covered by this standard (packaging, shipping, receiving, storage, and handling) are divided into four levels"

At Robinson 2 a classification system similar to ANSI N45.2.2-1972 has been developed and is fully implemented for the storage activity.

The other activities--packaging, shipping, receiving, and handling--are adequately covered by documented procedures or procedures will be developed as required; however, such procedures are neither tied to the classification system developed at Robinson 2 for storage, nor are they tied to the classification system developed in N45.2.2.

Regulatory Guide 1.38 (continued)

b. NRC Position C3

"Subdivision A.3.5.2 of ANSI N45.2.2-1972 permits tapes containing not more than 0.10% by weight of halogens and sulfur to be used in contact with austenitic stainless steel and nickel alloy surfaces. Subdivision A.3.6.3 of ANSI N45.2.2-1972 permits desiccants and desiccant bag materials containing not more than 0.25% halogens to be used with austenitic stainless steels. When used with austenitic stainless steel and nickel alloy materials, tapes, desiccants, and the materials for the desiccant bag should not be compounded from or treated with chemical compounds containing elements that could contribute to intergranular cracking or stress corrosion cracking. Examples of such chemical compounds are those containing chlorides, fluorides, lead, zinc, copper, sulfur, or mercury where such elements are leachable or where they could be released by breakdown of the compounds under expected environmental conditions (e.g., by radiation)."

CP&L

When used with austenitic stainless steel and nickel alloy materials, tapes, desiccants, and the materials for the desiccant's bag shall not be compounded from or treated with chemical compounds containing lead, zinc, copper, sulfur, or mercury or more than 0.1 percent (1000 ppm) halogens where such elements are leachable or where they could be released by breakdown of the compounds under expected environmental conditions.

6. Regulatory Guide 1.39 (March, 1973) - "Housekeeping Requirements for Water-Cooled Nuclear Power Plants" - Endorses ANSI N45.2.3-1973

NRC

"The requirements and guidelines for the control of work activities, conditions, and environments at water-cooled nuclear power plant sites which are included in ANSI Standard N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants," are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

CP&L

The applicable guidance of N45.2.3-1973 is followed at Robinson 2 within the context of the established Operation and Maintenance QA Program with the following specific exception--the zone designations of Section 2.1 of N45.2.3 and the requirements associated with each zone are considered impractical for implementation, as stated, at Robinson 2 during the operations phase. Instead, procedures or instructions for housekeeping activities, which include the applicable requirements outlined in Section 2.1 of N45.2.3 and which take into account radiation control considerations, security considerations and radiation zone cleanliness requirements are developed on a case basis for work to be performed.

7. Regulatory Guide 1.54 (June, 1973) - "Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants" - Endorses ANSI N101.4-1972

NRC

"The requirements and guidelines included in ANSI N101.4-1972, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities," for protective coatings applied to ferritic steels, aluminum stainless steel, zinc-coated (galvanized) steel, concrete, or masonry surfaces of water-cooled nuclear power plants are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR50."

CP&L

The applicable surfaces at Robinson 2 are recoated with original type coating or approved equal in accordance with original specification requirements.

8. Regulatory Guide 1.58 (August, 1973) - "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel" - Endorses ANSI N45.2.6-1973

NRC

"The requirements and recommendations for qualification of nuclear power plant inspection, examination, and testing personnel that are included in ANSI N45.2.6-1973 are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

CP&L

The qualification of Robinson 2 inspection, examination, and testing personnel will be in accordance with ANSI N45.2.6-1973 subject to the following:

- 1) N45.2.6 Sections 2.2.4, 3.1, and 3.2.2 - Only personnel performing NDE (PT, MT, UT, and RT) will be grouped in levels of capability and certified as such. However, inspection personnel are certified for implementing inspections, review and evaluation of inspection data and reporting of inspection and test results.
- 2) N45.2.6 Section 3.2.1 - Potential employees are required to receive a complete examination to assure satisfactory physical condition, but annual physical examinations are not required.

Regulatory Guide 1.58 (continued)

The near vision acuity of inspection, examination, and testing personnel will be checked annually by using the standard Jaeger's type chart or equivalent test type.

9. Regulatory Guide 1.64 (October, 1973) - "Quality Assurance Requirements for the Design of Nuclear Power Plants" - Endorses ANSI N45.2.11

NRC

"The requirements and recommendations for establishing and executing a quality assurance program during the design phase of nuclear power plants that are included in ANSI N45.2.11 (Draft 3, Rev. 1 - July, 1973) are generally acceptable to the AEC Regulatory Staff and provide an adequate basis for complying with the pertinent quality assurance requirements of 10CFR50 Appendix B."

CP&L

Those areas of the Operation and Maintenance Quality Assurance Program for Robinson 2 applicable to design or modification of the plant are in accordance with the applicable guidance of ANSI N45.2.11-1974.

10. Regulatory Guide 1.68 (November, 1973) - "Preoperational and Initial Startup Test Programs for Water-Cooled Power Reactors"

NRC

"Each applicant shall prepare and conduct preoperational and initial startup test programs including the provisions and applicable tests described in this section and Appendix A of this guide, as well as other preoperational and initial startup tests that have been identified in the final safety analysis report."

CP&L

The CP&L position regarding Regulatory Guide 1.68 is included in the letter sent by Mr. E. E. Utley to Mr. E. G. Case dated February 14, 1975.

11. Regulatory Guide 1.74 (February, 1974) - "Quality Assurance Terms and Definitions" - Endorses ANSI N45.2.10-1973

NRC

"The quality assurance terms and definitions contained in ANSI N45.2.10-1973 are generally acceptable for use in describing and implementing quality assurance programs for the design, construction, and operation of nuclear power plant structures, systems, and components subject to the following:

11. Regulatory Guide 1.74 (continued)

The definition of 'procurement documents' should be considered to include such documents as contracts, letters of intent, work orders, purchase orders, or proposals and their acceptances which authorize the seller to perform services or supply equipment, material, or facilities on behalf of the purchaser."

CP&L

The quality assurance terms and definitions of ANSI N45.2.10-1973 and Regulatory Guide 1.74 are being complied with for use in describing and implementing the Robinson 2 Operation and Maintenance QA Program.

12. Regulatory Guide 1.88 (August, 1974) - "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records" - Endorses ANSI N45.2.9-1974

NRC

"The requirements and recommendations for collection, storage, and maintenance of nuclear power plant quality assurance records that are included in ANSI N45.2.9 are generally acceptable to the AEC Regulatory staff and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

CP&L

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 records stored in the vault are kept in both fireproof file cabinets which have a one-hour fire rating and non-fireproof fire containers.

Regulatory Guide 1.88 (continued)

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.

Regulatory Guide 1.88 (continued)

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.

13. Regulatory Guide 1.94 (April, 1975) - "Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants" - Endorses ANSI N45.2.5

NRC

"The requirements and guidelines that are included in ANSI N45.2.5-1974 for installation, inspection, and testing of structural concrete and structural steel during the construction phase of nuclear power plants are generally acceptable to the NRC staff and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50."

CP&L

The original specification requirements, applicable guidance contained in Regulatory Guide 1.94, or acceptable alternatives based on an engineering evaluation shall be utilized in the event future structural work is to be performed which falls under the established requirements of the Robinson 2 Operation and Maintenance QA Program.

14. Included in all three of the above WASH documents are draft standards which are provided for guidance for quality assurance programs which comply with 10CFR Part 50, Appendix B. Following are the CP&L positions for Robinson 2 relative to those draft documents included in WASH-1283, WASH-1309, and WASH-1284:

14. (continued)

- a. ANSI N45.2.12 (Draft 3, Rev. 4 - February 22, 1974), "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants"

CP&L

The CP&L Quality Assurance Audit Program conforms to, and QA audits are conducted in accordance with N45.2.12 (Draft 4, Rev.1).

- b. ANSI N45.2.13 (Draft 2, Rev. 4 - April, 1974) - "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants"

CP&L

The applicable guidance contained in ANSI N45.2.13 (Draft 2, Rev. 4-April, 1974) will be utilized in relation to procurement of items and services performed under the established requirements of the Robinson 2 Operation and Maintenance QA Program.

- c. 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 Phase of Nuclear Power Plants"

CP&L

Within the context of the established Operation and Maintenance QA Program, the applicable guidance contained in ANSI N45.2.8 Draft 3, Rev. 3 - April, 1974) will be utilized in relation to mechanical maintenance or modification with the following exception--ANSI N45.2.8, Section 6 states, in part, "Procedures shall be established for processing inspection and test data and their analysis and evaluation." At Robinson 2 data processing procedures per se have not been developed; instead, test data is recorded, processed, and analyzed in accordance with procedures and instructions in appropriate functional areas, e.g., maintenance, startup, etc.

NRC

410.9 Describe measures to assure that errors and deficiencies that
(III) adversely affect safety-related structures, systems, and components
in the design process are documented, and appropriate corrective
action is taken.

CP&L

For design of new systems, changes thereto, and plant modifications,
as appropriate, errors and deficiencies that adversely affect
safety-related structures, systems, and components in the design
process shall be documented and appropriate corrective action shall
be taken as described in Robinson 2 manuals and procedures.

NRC ?

410.10 Describe measures to assure that the error inherent in the
(XII) calibration standards is less than the error of production
measuring and test equipment.

CP&L

The reference calibration standards used at Robinson 2 shall be traceable back to the National Bureau of Standards or other nationally recognized standards and shall be required to be at least ten times as accurate as the instruments they are used to calibrate. In cases where this accuracy is not achievable or practicable, an engineering evaluation or other appropriate justification shall be performed and documented to justify acceptability of the reference calibration standard in question. These requirements apply both when the standards are bought and when they are calibrated.