

CP&L

Carolina Power & Light Company

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Company Correspondence

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

JUN 8 1984

Robinson File No: 13510E

Serial: RSEP/84-407

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Atlanta, Georgia 30303

H. B. Robinson SEG Plant, Unit 2
Docket No. 50-261
License No. DPR-23
IE Inspection Report IER-84-13

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

Severity Level V Violation (IER-84-13-01-SL5)

10 CFR 50 Appendix B, Criterion X, requires the establishment of an adequate inspection program for activities affecting quality that prohibits work to proceed beyond hold points without the consent of designated representative. CP&L-TP-SGR-48A, Revision 0, "Edge Preparation Channel Head," was identified as the applicable procedure for machining the weld end preparation on the channel head for steam generator "A".

Contrary to the above, an adequate inspection program for activities affecting quality that prohibits work to proceed beyond hold points without the consent of designated representative was not established as evidenced by the following examples:

1. Work had progressed to step 4.5.5 of Procedure TP-SGR-48A even though hold points in steps 4.3.1, 4.4.1, 4.4.2, and 4.4.5 had not been signed off.
2. When asked, the licensee personnel gave varied definitions and controls relating to hold points.
3. The licensee stated that they do not have a documented policy containing clear requirements relating to hold points.

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Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason for the Violation

- A. A statement in procedure TP-SGR-48A allows the steps to be performed out of sequence for more efficient use of men and equipment which was shared between the three steam generators being replaced. However, in this instance the statement did not specify which steps may be performed out of sequence. This lack of specification contributed directly to the violation.

The hold points in question were sign offs for the field engineer, they were not QA inspector hold points. The QA inspector hold points were included in the same procedure and were not bypassed. If the field engineer sign offs were called surveillance points rather than hold points or if the statement was specific as to which steps could be performed out of sequence or the responsible engineer acknowledged in writing that the hold was being passed for a particular reason there would not have been a violation.

- B. A discussion on hold points is in 10 CFR 50 Appendix B. Criteria 10.

- C. CP&L's policy on hold points is as discussed in the above document. There was a discussion with the inspector on the differences between the field engineers "hold points" and the QA inspectors "hold points". The individuals speaking to the NRC inspector were faced with a potential violation on the definition of these "hold points" and did not quote the definition of a "hold point", when asked, until they could read it to the inspector. This may be why it appeared to the inspector that the license did not have a clear definition or policy on "hold points".

D. Corrective Steps Which Have Been Taken

The construction welding technical procedures controlling the steam generator replacement activity were reviewed and, where appropriate for procedures not yet performed, changes have been made to specify which steps can be bypassed. Where appropriate, surveillance points were substituted for field engineer hold points. Signing off hold points as work is completed and in sequential order or as specifically allowed by procedure is periodically emphasized to construction personnel involved in the replacement of the steam generators.

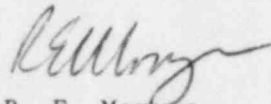
E. Date When Full Compliance Will Be Achieved

Full compliance has been achieved and corrective steps are continuing with constant reminders to ensure hold points are adhered to throughout the outage.

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If you have any questions concerning this response, please contact my staff or me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. E. Morgan", with a stylized flourish at the end.

R. E. Morgan
General Manager
H. B. Robinson SEG Plant

REM/js