



Carolina Power & Light Company

SEP 18 1984
H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

SEP 14 1984

Robinson File No: 13510E

Serial: RSEP/84-564

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
IE INSPECTION REPORT IER-84-27

Dear Mr. O'Reilly:

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

A. Severity Level IV Violation (IER-84-27-01-SL4)

10CFR50, Appendix B, Criterion V, requires activities affecting quality to be accomplished in accordance with procedures. CP&L Corporate QA Manual, Section 4.3.1.3, requires purchase requisitions for Plant quality related services be reviewed and approved in accordance with subsection 4.3.6 by the Corporate Quality Assurance Department prior to award; Section 5.2.2.1 of the CP&L Corporate Quality Assurance Manual requires Q-List items not be released until Receiving Inspection has been completed and items have been appropriately tagged to show status.

CP&L Procedure AP-XII-05, Rev. 0 "Warehousing", paragraph 4.6.3, requires all Q or safety-related material to be worked with an appropriate status tag ("Accept Tag or Conditional Release Tag") prior to release from the warehouse unit control. AP-XII-05, paragraph 4.4.2C., and ANSI N45.2.2, Packaging, Shipping, Receiving, Storage, and Handling of Items For Nuclear Power Plant (During the Construction Phase), paragraphs 2.7.3(2) and 6.1.2, require safety-related valves to be stored indoors.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that safety-related valves were removed from technical and QA adequacy prior to receiving inspection without status markings which resulted in the valves being stored outdoors.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason for the Violation

These valves did not have appropriate Q-status markings because they were transferred from another CP&L plant without the appropriate procurement documents. Without procurement documents, Material Receiving Reports were not initiated. Procedures did not specify the appropriate actions by warehouse personnel when the Q-status of materials is indeterminant. The valves were moved without proper documentation from outdoor storage at the Construction Warehouse to the welding preparation area. The NRC inspector noted the valve outside the weld preparation area.

3. Corrective Steps Which Have Been Taken

QA hold tags were placed on the valves prior to any weld preparation being performed on the valves. The valve identifications and cover/seals were intact. The valves were returned to the warehouse where a Material Receiving Report was issued, a procurement document was written, and QA/QC performed the receipt inspection. A letter was issued to Construction Warehouse personnel as to the appropriate actions to take when the Q-status of material has not been determined. New employees hired for the Construction Warehouse will be required to read the letter until this position is reflected in procedure AP-13. Construction Warehouse personnel also attended a training session in issue of "Q" material. Appropriate Construction management was reminded about procedure requirements for requisitions and the approval for purchase of material.

4. Corrective Steps Which Will be Taken

Construction Warehouse Procedure AP-13 will supercede AP-XII-05, Rev.0 and will reflect the appropriate actions to take when the status of materials has not been determined.

5. Date When Full Compliance Will be Achieved

Full compliance has been achieved with the above mentioned letter issued to Construction Warehouse personnel and the subsequent training. Construction Warehouse Procedure AP-13 is scheduled to be issued November 1, 1984.

B. Severity Level IV Violation (IER-84-27-02-SL4)

10CFR50, Appendix B, Criterion IX, requires measures be established to assure that special processes including nondestructive testing be accomplished in accordance with applicable codes. ASME B&P Code, Section V (80W80), Article 2, Table T-262.2, requires the use of a No. 40 Image Quality

Indicator (IQI) for weld over 2.50 "through 3" and a No. 45 IQI for welds over 3.00 "through 4.00". ASME B&PV Code, Section V, paragraph T-235.2, specifies radiographs shall be considered unacceptable if the image of a Lead Letter "B" appears in the radiograph. Contrary to the above, measures were not adequate to assure that non-destructive examination was accomplished in accordance with applicable codes in that the following was noted:

- a. A No. 50 IQI only was used for the accepted radiograph of "B" generator feedwater nozzle to remnant weld reported to be 3 to 5 inches thick.
- b. The image of a lead letter "B" appeared on two segments of the final accepted radiographs for the lower girth weld on "C" steam generator.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason for the Violation

- a. The radiographer incorrectly read across the Image Quality Indicator (penetrometer) designation chart to the incorrect penetrometer designation. Using this incorrect information, the radiographer attached the penetrometer to a numbered belt which was used for the three feedwater nozzle to remnant welds. The CP&L reviewer and authorized inspector did not recognize the use of the incorrect penetrometer.
- b. The radiographer overlapped film in order to cover a repaired area. Developing the film resulted in the backscatter "B" on the underlying film to register on the top film without actual backscatter.

3. Corrective Steps Which Have Been Taken

1. The radiographs in question have been reviewed and have been accepted "as is" based on the following:
 - a. The radiographs with the incorrect penetrometer were accepted based on the ASME Code Section V formula which allows the acceptance of equivalent sensitivity.
 - b. An evaluation of the backscatter "B" on the top film concluded that the source of the backscatter "B" was from the underlying film and not actual backscatter.
2. A review of radiographs has assured CP&L that no similar conditions exist in like film packages produced by the same contractor during the Steam Generator outage.
3. Appropriate CP&L NDE personnel were made aware of the reported incidents and were instructed to pay more attention to detail.

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4. Corrective Step Which Will be Taken

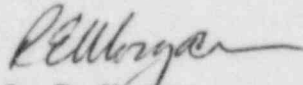
No further action is planned.

5. Date When Full Compliance Will be Achieved

Full compliance has been achieved.

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

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson SEG Plant

CLW/tk