



Carolina Power & Light Company

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

JAN 25 1985

Robinson File No: 13510E

Serial: RNPD/85-194

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 NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
I. E. INSPECTION REPORT IER-84-48

Dear Mr. O'Reilly:

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

Severity Level V Violation (IER-84-48-01-SL5)

10CFR50, Appendix B, Criterion XIII requires measures be established to control the handling, storage, and preservation of materials and equipment in accordance with work and inspection procedures to prevent damage or deterioration. FSAR Section 1.8 - Regulatory Guide 1.38 requires that tapes and adhesive materials when used on austenitic stainless steel and nickel alloy materials, shall not be compounded from or treated with chemical compounds containing lead, zinc, copper, sulfur, or mercury or more than 0.1 percent (1,000 ppm) halogens where such elements are leachable or where they could be released by breakdown of the compounds under expected environmental conditions.

Contrary to the above, adequate measures were not established to control the preservation of austenitic stainless steel from contamination, in that Health Physics signs were applied to safety-related austenitic stainless steel piping without verification that the sign adhesive analysis was consistent with the licensee's Quality Assurance Program requirements.

Response:

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

The issue of Health Physics stickers being used on stainless steel components at H. B. Robinson had been previously identified. At that time a decision was made to discontinue their use on safety-related stainless steel and nickel alloy components. An extensive effort ensued to remove the existing stickers from stainless steel components.

It is felt that the few Health Physics stickers found on the stainless steel piping were missed when this effort was conducted.

3. Corrective Steps Which Have Been Taken

The Health Physics stickers were removed and a detailed search was conducted to ensure no others were attached to stainless steel or nickel alloy components. The stickers have been analyzed for chlorides and found to be within the allowed specification.

A memorandum to Robinson Nuclear Project Department Managers and Supervisors has been issued to ensure personnel are familiar with the requirements for controlling the use of material in contact with stainless steel components.

4. Corrective Steps Which Will be Taken

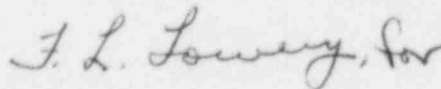
TMM-003, "Q-List Control Procedure" will be revised to contain a note stating that the use of any materials not specifically contained in this list shall be prohibited unless previously approved.

5. Date When Full Compliance Will be Achieved

Full compliance will be achieved by March 1, 1985.

If you have any questions concerning this response, please contact Mr. David C. Stadler at (803) 383-4524, Extension 363.

Very truly yours,



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

JCS/tk