



Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
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APR 3 1985

Robinson File No: 13510E

Serial: RNP/85-641

Dr. J. N. Grace
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
REGION II INSPECTION REPORT 85-05

Dear Dr. Grace:

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

A. Severity Level V Violation (RII-85-05-01-SL5)

10CFR50, Appendix B, Criterion V states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

ASME Boiler and Pressure Vessel Code (1977 Edition) Section V, Non-destructive Examination, paragraph 6.9, Post Cleaning, states that post cleaning after dye penetrant testing is important where residual materials might produce corrosion.

Robinson Procedure NDEP-201, Revision No. 6, states in part, that penetrant examination materials shall be removed from the subject surface after completion of the examination.

Contrary to the above, dye penetrant was observed to have been left on Service Water System piping.

RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L denies the alleged violation.

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2. Reason for the Denial

Investigation of the Service Water (SW) supply line for HVH-2, located on the second level in containment, revealed four streaks of dye penetrant on a vertical section of the supply line pipe. This penetrant began as spots approximately 8 to 10 inches above a new sleeve weld and streaked down the vertical run of pipe across the new sleeve weld. The penetrant was confined within an area of approximately 180 degrees or half the circumference of the pipe. In addition to the penetrant on the pipe, three large spots were also found on a wall adjacent to the pipe and several small spots on a cable tray beside the pipe.

Based on the locations and sizes of the areas of penetrant, CP&L concludes that this penetrant was the result of spillage and not improper cleaning after a penetrant test.

In performing a dye penetrant test, the sequence is 1) clean the area to be examined, 2) apply the dye penetrant, 3) remove the excess dye penetrant, 4) apply the developer, and 5) post test clean.

Since there is penetrant only on the pipe and its removal is essential to the completion of a test, it is not the result of a penetrant test and would not be a violation of NDEP-201 Section 16 which requires the removal of penetrant materials after completion of examination. The penetrant streaks were not observed by the inspector that performed the pressure test inspection of the system after completion of the required repairs. CP&L respectfully requests that this violation be withdrawn.

3. Steps Which Have Been Taken to Clean the Subject Pipe

Dye penetrant was removed from the pipe using a certified cleaner. The wall and cable tray were cleaned as much as possible using certified cleaner.

B. Severity Level IV Violation (RII-85-05-02-SL5)

10CFR55 Section 55.33 and Appendix A require that each licensed individual demonstrates his continued competence every 2 years for his license to be renewed. Competence may be demonstrated in lieu of re-examination by satisfactory completion of a requalification program which has been approved by the Commission. H. B. Robinson Training Procedure (TI)-200, requires that an annual written requalification examination shall be administered to all licensed and certified personnel each calendar year.

Contrary to the above, 4 licensed Training Department personnel have been routinely exempted from taking the annual written requalification examination.

RESPONSE

1. Admission or Denial of the Alleged Violation

The violation as described in the NRC Inspection report is correct in that exemptions were granted for licensed personnel developing, reviewing, and grading the annual written requalification examinations.

2. Reasons for the Violation

TI-200 (The Robinson Plant Operator Requalification Program) did not contain any provision for allowing exemptions of licensed personnel who developed, reviewed, and graded the annual written requalification examinations. Licensed Training staff personnel had been routinely exempted from taking the annual written requalification examination since they participated in the preparation, review, and grading of the annual requalification examinations. This practice was based on the following:

- a. This has been an accepted industry practice.
- b. ANSI/ANS 3.1 - 1981 (5.5.1.5) grants exemptions for individuals who prepare, administer, and grade written examinations.
- c. The second and third proposed revision 2 to NRC Reg. Guide 1.8 endorses ANSI/ANS 3.1 - 1981.

3. The Corrective Steps Which Have Been Taken and Results Achieved

This violation has been discussed with NRC personnel in Region II to request guidance for annual requalification examinations exemptions. Other utilities have also been consulted as to how they handle the annual requalification examinations. TI-200 will be revised prior to the 1985 annual requalification examination to add exemption criteria for licensed individuals that develop, review, and administer the annual requalification examinations.

4. The Corrective Steps Which Will be Taken to Avoid Further Violations

TI-200 will be revised to incorporate exemptions for individuals who develop, review, and administer the annual requalification examinations. The number of personnel exemptions will be limited to those necessary to perform this work. In addition, they will not be exempted from taking the annual requalification examination for any two (2) consecutive years. This change will require each licensed individual who exempted the examination in 1984 to participate in the 1985 examination.

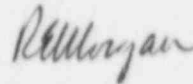
5. The Date When Full Compliance Will be Achieved

This change to the H. B. Robinson TI-200 will be completed by May 31, 1985. The approved change will be implemented before the 1985 annual written requalification examination is developed.

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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

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cc: Document Control Desk
H. E. P. Krug