



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W., SUITE 3100
 ATLANTA, GEORGIA 30303

Report No. 50-261/79-19

Licensee: Carolina Power and Light Company
 411 Fayetteville Street
 Raleigh, North Carolina 27602

Facility Name: H. B. Robinson

Docket No. 50-261

License No. DPR-23

Inspected at CP&L Company Offices, Raleigh, NC, and H. B. Robinson Nuclear Station near Hartsville, South Carolina

Inspectors: <u>R.H. Wessman for</u>	<u>10/12/79</u>
H. D. Jenkins	Date Signed
<u>R.H. Wessman for</u>	<u>10/12/79</u>
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<u>R.H. Wessman for</u>	<u>10/12/79</u>
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Approved by: <u>R.H. Wessman</u>	<u>10/12/79</u>
R. H. Wessman, Acting Section Chief, RONS Branch	Date Signed

SUMMARY

Inspected on September 10-14, 1979

Areas Inspected

This routine, announced inspection involved 122 inspector-hours onsite in the areas of QA annual review, QA audits, design changes, records, document control, 10 CFR Part 21, procurement, receipt, handling and storage, offsite staff support, housekeeping/cleanliness, and test and experiments.

Results

Of the 11 areas inspected, no apparent items of noncompliance or deviations were identified in 8 areas; 3 apparent items of noncompliance were found in 3 areas (Infraction - Failure to implement 10 CFR Part 21 reporting requirements - Paragraph 8.d; Infraction - Failure to follow procedures - Paragraph 7.b; Deficiency - Failure to have a procedure Paragraph 5.c.).

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DETAILS

1. Persons Contacted

Licensee Employees

H. R. Banks, Manager - Nuclear Generation
#*N. J. Chiangi, Manager - Engineering and Construction, QA
#C. W. Crawford, Operating Supervisor
#J. M. Curley, Engineering Supervisor
*W. J. Dorman, Senior QA Specialist
#W. T. Traylor, Administrative Supervisor
#B. W. Garrison, QA Supervisor
#*J. M. Johnson, Manager - Operations QA
*L. E. Jones, Principal QA Engineer
R. E. Jones, Legal Department
*S. McManus, Manager - CNS&QAA
*R. S. Pollock, Principal QA Specialist
#C. E. Rose, Jr. Operations QA Specialist
E. W. Sexton, Principal Buyer
#B. H. Snipes, Senior QA Specialist
#S. Zimmerman, Maintenance Supervisor
#R. B. Starkey, Jr., Plant Manager

Other licensee employees contacted included technicians, operators, mechanics, and office personnel.

*Attended exit interview at Company Offices

#Attended Exit Interview at Site

2. Exit Interview

The inspection scope and findings were summarized on September 11, 1979, at Raleigh, and September 14, 1979, on site with those persons indicated in Paragraph 1 above. Those open items identified in Paragraphs 5.g, 5.h, 5.j., 7.e., 9.b., 9.c., 10.b., 10.c., 11.c., 12.c., and 13.b., were committed to be completed by the Plant Manager or appropriate company Officer as indicated in each report discussion item. The unresolved items discussed in Paragraphs 5.d., 5.e., 5.f., 6.b., 7.c., and 7.d, were all licensee identified items by the Operational QA Organization and acknowledged by the Plant Manager. The items of noncompliance discussed in Paragraphs 5.c, 7.b., and 8.d., were acknowledged by Company Officers or the Plant Manager, as applicable.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. New unresolved items identified during this inspection are discussed in Paragraphs 5.d, 5.e., 5.f., 6.b., 7.c., and 7.d.

5. QA Program-Periodic Review

- References:
- a) QAP 1, Revision 1, dated 1/78
 - b) QAP 2, Revision 2.2, dated 4/77
 - c) QAP 3, Revision 4, dated 4/79
 - d) QAP 3A, Revision 2, dated 7/79
 - e) QAP 4, Revision 1.1, dated 6/77
 - f) QAP 4A, Revision 2, dated 7/79
 - g) QAP 4B, Revision 2, dated 7/79
 - h) QAP 4C, Revision 2, dated 7/79
 - i) QAP 5, Revision 0, dated 4/79
 - j) QAP 6, Revision 3, dated 6/79
 - k) Volume I, Administrative Instruction, Section 8 Revision 30, dated 9/79
 - l) CP&L Technical Specification Change, Amendment 41, dated July 2, 1979.

a. Inspection Items

The changes made to the licensee's QA procedures during the period (January 1978, to September 14, 1979) were reviewed with respect to maintaining the implementation of the accepted QA Program. The licensee's current "Q" List was reviewed for consistency with the items used in the safety-related operations of the facility. In addition, selected personnel were interviewed during the conduct of other areas of the inspection as documented in this Report to assure that changes in procedures were understood and available for use. The accepted QA Program was changed during the period since the last inspection of this area, so that aspects of revision control were inspected. The specific changes reviewed are those listed under references for Paragraph 6 and those listed above.

Additionally, the inspector verified that the changes were made consistent with Technical Specifications and that the change was submitted to NRR for approval.

b. Implementation

The inspector verified that responsibilities and methods have been established and controlled to assure overall review of the effectiveness of the QA Program. The remaining inspection items discussed in this report also deal with verifying adequate Program implementation.

As a result of this inspection, one (1) item of noncompliance (Paragraph 5.c) three (3) unresolved items (Paragraphs 5.d 5.e, 5.f. and two (2) open items, Paragraphs 5.g and 5.h were identified as set forth in the following paragraphs.

c. Failure to have a Q-List Control Procedure

The inspector reviewed the Q-List onsite for status and adequacy and identified that although the Station Manager is responsible for its control, there was no procedure describing the maintenance and control of the Q-List. 10 CFR 50, Appendix B, Criterion V requires that activities affecting Quality shall be prescribed by documented procedures. The corporate QA Program, Section 1.6.1, requires that a written procedure be provided to develop and control the administration of the Q-List.

Until a Q-List Control procedure is developed, approved, and implemented, this item constitutes an item (261/79-19-01) of noncompliance.

d. Failure to Establish a Cleanliness Control Program

The inspector identified the significant lack of a cleanliness control program as required by ANSI N 45.2.1-1973, as committed to by the accepted Program. While accompanying a QC inspector on the inspection of the reinstallation of the spent fuel pit cooling pump, the inspector noted that no consideration was given by the QC inspector as to the status of cleanliness at the system penetration since the old pump had been replaced and the new pump was already in place. Reference b) describes the levels of cleanliness, but does not establish a cleanliness control program. This item is licensee identified in OQAI-79-19(R).

Until the licensee develops, approves and implements a cleanliness control program to include closeout inspections by QC inspectors at QC holdpoints, this item (261/79-19-04) is unresolved.

e. Inadequate Inspection Program

During the inspector's review of onsite QA/QC activities, he identified a lack of instructions regarding the tasks assigned a QC inspector inspecting quality controlled jobs. CP&L QA Program (FSAR Section 10 Article X) requires inspection procedures or instructions to be available for use prior to performing the inspection. Such instructions were not formally developed for other than NDE-type inspections. Additionally, the inspection shall be performed in accordance with original design and inspection requirements. No provision exists presently to enforce this. This item has been identified by the licensee in OQAI-79-20 and OQAI-79-76; action is being developed by the licensee to provide the required inspection procedures. An additional finding in this area is discussed in paragraph 7.d.

Until the licensee establishes procedural guidance for QA/QC inspections for maintenance and design changes, this item (261/79-19-05) is unresolved.

f. Failure to Establish a Program of Trend Evaluation

The inspector reviewed several safety-related maintenance packages and identified significant trends in the failure of specific items. Three systems demonstrated a repetitive failure that appeared to lack the necessary evaluation by performance personnel. One example showed that maintenance to repair a significant leak on "B" Service Water Booster Pump occurred four times (January 16, 17, 20, and 25, 1979). ANSI N18.7-1972, as committed to by the accepted Program, requires that a program exist to evaluate the cause of component failures and to identify and evaluate components whose performance is unsatisfactory or marginal. Such a program does not exist; however, the lack of said program has been identified by the licensee in OQAI-79-2(R).

Until the licensee develops, approves, and implements the required trend evaluation program described in ANSI N18.7, this item (261/79-19-06) is unresolved.

g. CP&L Company Reorganization

The reorganization of CP&L at the corporate level necessitated a change to the QA Program as described in Section 6 of H. B. Robinson's Unit no. 2, Technical Specifications and in Section 10 of the FSAR. The inspector verified that Technical Specification Amendment 41, dated July 2, 1979, was submitted to NRR identifying the reorganization. NRR's letter of concurrence is dated September 5, 1979.

Additionally 10 CFR 50.59 requires a safety-evaluation for changes made to the FSAR to determine whether or not an unreviewed safety question exists. As of September 14, 1979, no evaluation of the QA Program with respect to the reorganization has been made. This item is previously identified by the licensee as OQAI-79-44(R).

Until the requirements of 10 CFR 50.59 are met, this item (261/79-19-07) is open. The Station Manager committed to a completion date of November 1, 1979, for this item.

h. Update of Corporate and Site QA Cross-References

During the review of QA administration the inspector compared several 10 CFR 50 Appendix B criteria with the accepted CP&L QA Program articles and identified that Appendix I in both the Corporate QA Manual and the H. B. Robinson Continuing QA Program, Volume II, were not up to date. Section 10, Part II, Article D requires the cross-reference of each of the 10 CFR 50 Appendix B criteria with applicable sections of the QA Manual. Until the licensee updates both appendices to reflect current QA status, this item (261/79-19-08) is open. The Manager, Operations QA and the site Manager have committed to a completion date of October 15, 1979 for this item.

i. Calibration Program for Safety Related Instruments

The inspector identified that the requirements of ANSI 45.2.4-1972, and ANSI 18.7-1972 have not been fully implemented in that a complete calibration program for safety-related instruments has not been implemented. Operations Quality Assurance Surveillance report OQAI 79-25 identified this problem and we concur with the findings. Scheduled completion for this item is 1/1/80.

Until the licensee implements a program to place safety-related instruments under a calibration program, this item (261/79-19-09) is open.

6. QA Audits and Surveillance

- References:
- a) QAA-20-15, QA Audit, dated 1/78
 - b) QAA-20-16, QA Audit, dated 8/78
 - c) QAA-20-17, QA Audit, dated 2/79
 - d) QAA-20-18, QA Audit, dated 7/79
 - e) QAAI-1, Instruction for Preparing, Distribution, and Maintaining the Corporate QA Audit Documents and the Corporate QA Program, dated 79/79
 - f) QAAI-2, Instruction for Training and Qualification of QA Program Audit Personnel, Revision 3, dated 9/79
 - g) QAAI-2, Instruction for Collection, Storage and Maintenance of QA Records Within the QA Audit Units, dated 9/79
 - h) QAAP-1, Procedure for Corporate and ASME QA Audits Revision 7 and 8, dated 6/79 and 9/79, Respectively.

a. Inspection Items

The completed Quality Assurance audits for the period since the last inspection of this area (February 17, 1978) were reviewed. Four (4) audits had been completed for the activities related to H. B. Robinson Station. The audits reviewed were designated: QAA-20-15, QAA-20-16, QAA-20-17 and QAA-20-18. These audits were reviewed with respect to the requirements of the accepted QA Program to assure that they were conducted: in accordance with written checklists/procedures; by trained personnel not having direct responsibility in the area being audited; with the results documented and reviewed by the managers responsible for the audited area and by those directing the QA Program; and, with timely corrective action taken and reported. Additionally, the inspector reviewed the last management audit of Corporate Nuclear Safety and QA Audit Section (CNS & QAA), transmitted via R. L. Mayton, JR., memo dated May 8, 1979.

Surveillance activities of the Operations QA group and the onsite QA group were also reviewed with respect to items which remained either uncorrected or unanswered as of this inspection.

As a result of these reviews, the inspector identified one (1) unresolved item discussed in Paragraph 6.b below.

b. Inadequate Duplicate QA Records Storage

The inspector reviewed the duplicate QA records storage situation for records generated by and stored within the company offices. As of September 11, 1979, QA records developed by CNS and QAA auditing H. B. Robinson site's QA Program were being stored in standard file cabinets on the ninth and seventh floors of the single company office building. Additionally, vendor surveillance audit records were stored on the sixth and seventh floors. ANSI N45.2.9-1974, as committed to by the accepted QA Program, requires that QA records be stored in a fire-rated vault or duplicated and stored in separate remote locations which have been predetermined. The NRC position in this case is that remote shall mean separation of a least six (6) floors in a Class 1 or Class 2, fire-rated building with an installed sprinkler system.

For purposes of describing the QA records required to be stored, ANSI N45.2.12-1977, as committed to by the accepted program, states in Section 5.1 that the audit system plan, individual audit plans, audit reports, written replies and the record of completion of corrective action be included in the record packages maintained.

Until the licensee provides duplicate records storage for corporate-generated audit records in a suitable facility, consistent with NRC requirements, this item (50-261/79-19-10) is unresolved.

7. Design Changes/Modifications

- References:
- a) Administration Instructions Volume I, Revision 30, dated 8/31/79
 - b) H. B. Robinson Quality Assurance Manual Volume 11, Revision 1, dated 8/79

a. Inspection Items

The inspector reviewed the licensee's design changes/modifications program with respect to his implementing procedures and guidance referenced above. Seven (7) design changes packages were reviewed which covered the period from March 1973, to May, 1979, and involved changes to the system listed below.

- Modification, #M130 R2, Manipulator crane
- Modification, #M133, Residual Heat Removal System
- Modification, M152, Safety Injection System
- Modification, M#450, Revision to Rod Banks C&D
- Modification, #440, Cooling Fans for Relay Protection Cabinets
- Modification, M247, Containment Vacuum Relief Valve & Pressure Relief Valve Control

- Modification, M471, Pressurizer Level Removal from Safety Injection

For the items selected, the inspector verified that documentary evidence was available on-site to support their conformance to design change requirements. Design inputs, encompassing codes, standards, Regulatory requirements, and design bases, were verified. Additionally, as-built drawings affected by the selected design changes were reviewed to verify their up-to-date revision status.

As a result of the review the inspector identified one (1) item of noncompliance discussed in Paragraph 7.b. Two (2) unresolved items discussed in paragraphs 7.c. and 7.d., and one open item discussed in paragraph 7.e. below.

b. Failure to Follow Procedure

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of Regulatory Guide 1.33 dated November 3, 1972. Administration Instruction Section 11.11 requires temporary jumpers be tagged and logged in the Shift Foreman's Jumper and Wire Removal Log. The inspector identified that a jumper had been installed as a temporary power feed from MCC-9 to the Computer Inverter without being tagged or logged in the Jumper and Wire Removal Log. The licensee took immediate corrective action and the inspector verified the action. This failure to follow procedures constitutes an item of noncompliance (261/79-19-02). In response to this example of noncompliance the licensee need only respond to action taken to prevent recurrence.

c. Separation of Circuits That Could Impact Safety

The inspector identified during the review of Modification 440 which was completed in January 1979, that a common cable was pulled as a power supply for Cooling fans installed in safety-related relay cabinets (numbers 51, 52, 53, 54, 55, 56), (59, 60, 61, 62, 63, 64) which consisted of both Channel A and Channel B relay cabinet designations. Section 8 of the FSAR states in part; "that cables assigned to these two channels for separation will be in their respective channels, and so designated from the beginning of the cable to the final termination. These cables include the following...: small power cables are run in any channel as convenience". The inspector discussed this problem with the licensee and the licensee agreed to evaluate the design of Modification and correct the design if required. Until the licensee completes the design evaluation and the NRC reviews the evaluation this item is unresolved (261/79-19-11).

d. Failure to designate QC hold Points

During the review of the referenced Modifications the inspector found that QC hold points were not being designated in the modification implementing procedures. In discussion with the licensee it was determined that similar findings had been identified by the licensee's Operations Quality Assurance surveillance reports QQAI 79-20 and 79-26, however no date for resolution was given for the findings. Until the licensee resolves the above mentioned surveillance reports and the results are inspected this item is unresolved (261/79-19-12).

e. Plant Drawings

The inspector found during the inspection that there existed no method which would indicate a drawing was undergoing revision to show the as-built condition. The licensee is currently engaged in updating drawings to show the as-built conditions and will have a program implemented which would identify those safety-related drawings for which a modification had been completed and the drawing not yet revised. In discussion with the licensee it was determined that a similar finding had been identified by the licensee's Operations Quality Assurance surveillance report QQAI 79-9 and is scheduled for completion 11/30/79.

Until the licensee implements a program for drawing control which would identify those safety-related drawings that have as-built conditions pending this item is open (261/79-19-13).

8. 10 CFR Part 21

- References:
- a) Procedure for compliance with Part 21 Title 10 of the Code of Federal Regulations by the corporate Directors of CP&L, Rev 1, June 1, 1979.
 - b) Procedure for Evaluating and reporting of defects and noncompliance in accordance with 10 CFR 21, Rev 1, June 1, 1979.
 - c) Procedure for Evaluating Deficiencies in accordance with 10 CFR 50.55(e), Rev 4, November 13, 1978.
 - d) Technical Services Department Engineering and Construction Quality Assurance Procedure AQA5-5; Reportable Items Under 10 CFR 50.55(e) and 10 CFR 21.
 - e) H. B. Robinson Administrative Instructions, Section 4, Trouble Reports.
 - f) H. B. Robinson 2, Administrative Instruction, Section 12, Reportable Occurrences (LER).

a. General

Each organization, such as CP&L, that constructs, owns or operates a facility which involves "basic components" as defined under Part 21 is subject to its regulations. CP&L and its responsible officers must therefore ensure compliance with requirements of Part 21 as specified in Section 21.6, for posting; 21.21.(a), for procedures; 21.21.(b), for notification and written reports to the commission; 21.31, for the inclusion of appropriate references in procurement documents; and 21.51, for preparation and maintenance of records. Inspector determinations are based on the requirements of 10 CFR 21 as clarified by staff positions in NUREG-0302, Revision 1.

As a result of this inspection, the inspector identified one (1) item of noncompliance discussed in Paragraphs 8.b, 8.c and 8.d below.

b. Engineering and Construction Group (ECG)

The inspector held discussions with responsible management personnel and reviewed the Part 21 controlling procedures noted in references (a) through (d) above.

During the discussions and review of the noted procedures the inspector determined that the current CP&L ECG procedures and activities do not provide for the evaluation of all deviations, informing the responsible officer, notifications to the commission, and the preparation and maintenance of records as required by Part 21.

Reference (b) above, paragraphs 4.3.1, 4.3.1.1, 6.1, 6.2, 6.2.1 indicate that a formal Part 21 evaluation will be accomplished and the responsible officer informed, only, when the responsible officer becomes aware of a potential deviation or failure to comply external to his operating staff and he then requests information. Discussions with CP&L personnel confirmed that CP&L operating staff routinely evaluate for 10 CFR 50.55(e) reportability and only perform a formal Part 21 evaluation when requested by the responsible officer and then only when the matter has not already been evaluated as a 10 CFR 50.55(e) item.

The licensee was informed that this method of operation did not meet the requirements of part 21.21(a), 21.21(b) and 21.51.

c. Power Generation Group (PGG)

The inspector held discussions with responsible management personnel and reviewed the controlling procedures noted in references (a), (b), (e), and (f) above.

During the discussions and review of the noted procedures the inspector determined that CP&L PGG procedures and activities do not provide for the evaluation of all deviations and failures to comply to determine

if the defect, condition or circumstance could create a substantial safety hazard. Robinson instructions address the evaluation and reporting of Licensee Event Reports. Part 21 evaluations are not made. Since evaluations are not being performed, it follows, that the informing of the responsible officer (21.21(a)(2)), notifying the NRC (21.21(b)(1)), written report information (21.21(b)(3)), and maintenance of records (21.51) requirements of Part 21 are not being met.

d. Finding

CP&L has not developed and implemented appropriate procedures to assure that deviations are evaluated (21.21(a)(1)); the director or responsible officer is informed (21.21 (a)(2)); the written report to the Commission contains the required information (21.21(b)(3)); and that the required records are maintained (21.51). This matter is identified as an item of noncompliance (No. 50-261/79-19-03).

9. Records

References: a) H. B. Robinson Administrative Manual, Vol. I
b) Technical Specifications, Section 6

a. Inspection Items

The inspector reviewed and verified the licensee's program for control, storage, retention, and retrieval of records and documents pertaining to safety-related systems. By selecting a representative sample of documents (listed below) the inspector reviewed the implementation of these controls.

- (1) PT-1.4, Nuclear Instrumentation Comparator Channel, dated 7/75
- (2) PT-5.2, Pressurizer Pressure Protection Channel Testing, dated 4/73
- (3) PT-9.2, Fire Pumps and Fire System Valves for Unit 1 and Unit 2, dated 4/74
- (4) PT-9.4, Portable Fire Extenguisher, Fire Hose Stations and Houses, Revision 2, dated 1/76
- (5) Control Operator Log for period 1/79 through 4/79
- (6) Shift Foreman's Log for period 10/23/75 through 11/10/75
- (7) Purchase Orders (Q-list):
 - (i) P. O. 650156, Whiting Corp. (Repair of Polar and other Cranes)
 - (ii) P. O. 649804, Southchem, Inc. (Chemicals)

(8) PNSC Meeting Minutes

(i) 313th Meeting-PNSC minutes of 11/28/76

(ii) 210th Meeting-PNSC minutes of 8/28/75

(9) Design Change/Modification-M-444 Relocate Unit 2 Engine Driven Fire Pump Batteries, dated 8/24/78

(10) Licensee Event Reports

(i) Abnormal Occurrence Report No. 50-261/75-13, dated 7/1/79

(ii) Licensee Event Report 79-979, dated 9/7/79

As a result of this inspection activity, two unresolved items were identified as set forth in paragraphs 9.b and 9.c below.

b. Contradictory FSAR/Commitment Letter Statements

The QA commitment to Regulatory Guide 1.88, paragraph 12(1), requires protection of vital QA records by evacuation during flooding conditions. This is inconsistent with the FSAR statement regarding flood conditions at the site. This item was identified by the licensee in Report No. OQAI-79-17(R). The Plant Manager stated that a letter to NRR deleting the commitment letter statement would be accomplished by 11/1/79. This item is open pending satisfactory review of clarification of contradictory statements (261/79-19-14).

c. QA Vault Duct Damper Fusible Links

The QA commitment to Regulatory Guide 1.88, paragraph 12(2)(b), requires that QA vault ducts be equipped with dampers which will automatically close. No objective evidence has been presented to demonstrate implementation of the above by post-installation testing as required by ANSI N45.2.4. The Plant Manager stated that resolving documentation would be available by 11/1/79. This item is open pending satisfactory review of the above (261/79-19-15).

10. Document Control

References: a) H. B. Robinson Administrative Manual, Vol 1, Administrative Instruction

a. The referenced document was reviewed with respect to the licensee's accepted Quality Assurance Program and ANSI N45.2.11-1974. The inspection was to verify that administrative controls had been established to ensure that all locations where drawings, technical manuals, FSAR's procedures, specifications, and other controlled documents were located had current/as-built copies, that obsolete

documents were controlled, and that changes to documents were incorporated or indicated as pending. By selecting a representative sample of documents (listed below) the inspector reviewed the implementation of these controls.

- (1) MI-11, Procedure 1-3, RC Temperature, dated 2/78; I&C Maintenance Area
- (2) MI-11, Procedure 2, RC Flow, dated 2/78; I&C Maintenance Area
- (3) MI-11, Procedure 3-1, Pressurizer Water Level, dated 2/78; I&C Maintenance Area
- (4) MI-11 Procedure 3-2 Pressurizer Water Level, dated 2/78; I&C Maintenance Area
- (5) MI-11 Procedure 4-2 Pressurizer Pressure Control, dated 2/78; I&C Maintenance area
- (6) MI-11 Procedure 7 Rod Position Indication System, dated 2/78; I&C Maintenance Area
- (7) Rod Position Indication Instruction Manual as-built drawings, KD-8807-3 "Elementary Diagram Rod Position System, sheets 1/15 thru 5/15; vault area/IC Maintenance area
- (8) Full Length Rod Control System, Volume 2, Chapter 2 dated 1/70
 - (i) Logic Flow, Maximum System dwg 6056D01 sheet 6/15
 - (ii) Pulser, Schematic Diagram, dwg 3362C14 sheet 1/1 I&C Maintenance/Vault Area

In addition eight (8) sets of Ebasco Specifications in the Engineering Library and several from the xerox duplicating room book shelves were reviewed.

As a result of the inspection activity, two open items were identified as set forth in paragraphs 10.b and 10.c below.

b. Control Procedures For Specifications

The requirements of ANSI N45.2.11, paragraph 4.4, specify that procedures be established for the preparation and control of specifications. Contrary to the above, procedures for control of all specifications in usage have not been fully established. This item was identified by the licensee in Report No. OQAI-79-4(R). A scheduled completion date for correction of the above is 11/30/79, as committed to by the Plant Manager. This item is open pending satisfactory review of specification procedures (261/79-19-16).

c. Technical Manual Control

The requirements of ANSI N45.2.9 and ANSI N45.2.11 are that drawings reflect "as-built" conditions. Technical manuals which contain drawings and instructions that are utilized to perform safety-related activities are to be controlled. While a system for control and updating is partially in place it is incomplete and undocumented. This item was identified by the licensee in Report No. OQAI-79-9(R). A scheduled completion date for correction of the above is 1/1/80, as committed to by the Plant Manager. This item is open pending satisfactory review of documentation for control and its implementation (261/79-19-17).

11. Procurement

- References:
- a) Corporate QA Program, Part 2, Operation and Maintenance, Section 4-Procurement Control
 - b) Corporate QA Program, Part 1, Engineering and Construction, Section 4 - Procurement Control
 - c) Interdepartment Interface Agreements, Section 1, CP&L memorandum of agreement Power Plant Engineering Department and Generation Department, June 30, 1977
 - d) Purchasing Department Guideline for Review of Nuclear-Safety Requisitions for Brunswick and Robinson Plants
 - e) H. B. Robinson 2 QAM, Section 4, Procurement Control
 - f) Qualified Vendors list

a. Program Review

The referenced documents were reviewed with respect to the licensee's accepted Quality Assurance Program and ANSI N45.2.13, 1/9/76, as committed to by that Program. The inspection was to verify that procedures for the procurement of safety-related items provide for: identification of the item or service purchased; identification of test, inspection, acceptance criteria and any special instructions; requisite technical requirements; access to supplier's plant or records for purposes of audit; documentation necessary to certify the item being purchased; and, requirements for the supplier to provide a QA program consistent with the licensee's accepted Program.

The licensee's current procedures and practices were reviewed to assure that responsibilities had been assigned and methods had been stipulated for: Initiation of procurement documents; review and approval of specifications differing from the original design documents; review and approval of documents, including changes thereto; making the designation of quality classifications.

With respect to current suppliers, the licensee's practices and procedures were reviewed to verify that they provided: methods for "qualifying" vendors; systems for maintaining an "approved bidders" list; channels of communications for feedback on equipment performance to persons evaluating suppliers; and, methods and schedules for auditing vendors as required.

As a result of this inspection, one (1) open item was identified as discussed in Paragraph 11.c below.

b. Implementation

The licensee's program for procurement control was reviewed at the Company offices in Raleigh, N.C., and at H. B. Robinson Nuclear Station with respect to the requirements of the referenced documents. After verifying that appropriate QA/QC lists and procedures were available to personnel performing the various procurement tasks, the inspector selected twenty one (21) safety-related items that had been received on site. The specific items selected were : Purchase order Nos.: 627663, 659906, 669544, 628504, 620234, 626986, 688974, 708030, 695485, 609964, 675586, 568380, 704790, 635046, 663012, 682222, 682128, 713106, 711081 Item 2, 711081 Item 3, and 666297.

Each item selected was reviewed to verify that: Procurement documents were prepared in accordance with established controls; they were purchased from "qualified" vendors; that required documents were available on site to establish conformance to procurement specifications; that receipt inspections and subsequent disposition of items was in accordance with established controls; and that item traceability was maintained.

The licensee's approved bidders list was reviewed and five (5) suppliers were selected. Each was reviewed to verify that evaluations and/or audits had been performed as required.

c. Inclusion of Consumable Items on the "Q" list

Prior to this inspection operations Quality Assurance identified (surveillance Report No. OQAS-7-1(R) in Action Item OQAI-79-7(R) that consumable items were not included in the current CP&L list of "Q" items. CP&L has scheduled the review of consumable items used at Robinson, the inclusion of appropriate items on the "Q" list, and the delineation of which portion(s) of the current QA program would be applied to the control of these items to be completed by December 1, 1979. This item (50-261/79-19-18) will be reviewed during a future inspection.

12. Receipt, Storage, and Handling of Equipment and Material

- References:
- a) H. B. Robinson QAM, Volume II Section 4, Procurement Control
 - b) H. B. Robinson QAM Volume II, Section 5, Material and Equipment Control
 - c) Procedure MI-8, Receiving and Storing Certified Parts
 - d) Qualified Vendors List

a. Program Review

The referenced documents were reviewed with respect to the licensee's accepted Quality Assurance Program and ANSI N45.2.2, 1972, as committed to by that Program. The inspection was to verify that administrative controls had been established for the receipt of safety-related items which required: shipping damage inspection; receipt inspection; dispositioning, segregation and identification of items; and, the documentation of these activities.

Storage procedures and practices were reviewed to assure that they provided for: levels of storage and appropriate environmental controls; access, identification, covering and preservation of items; periodic inspections of the storage area; maintenance and care of items in storage including controls for items with limited shelf life; and, assignment of responsibilities for the above activities.

Handling activities were reviewed to determine that programs and procedures had been developed for: specification of routine and special handling requirements; controlling hoisting equipment; and, inspection of rigging equipment as required by the Program.

b. Implementation

The licensee's receipt, storage and handling programs were reviewed at H. B. Robinson Nuclear Station with respect to the requirements of the referenced documents. The inspector selected twenty one (21) safety-related items which had been received on site and verified that receipt inspections, dispositioning, and storage had been accomplished in accordance with the licensee's Program. The specific items selected were: Purchase Order Nos.: 627663, 659906, 669544, 628504, 620234, 626986, 688974, 708030, 695485, 609964, 675586, 568380, 704790, 635046, 663012, 682222, 682128, 713106, 711081 Item 2, 711081 Item 3, and 666297.

The inspector then performed a walk through inspection of the warehouse and verified that required storage and housekeeping controls were in use. During the inspection the inspector selected six (6) items in storage and verified that tagging/marking allowed traceability of the items to purchase, receipt, and procurement documents.

No items of noncompliance or deviation were identified during the review of purchase orders, approved vendors list, Part 21 inclusion, appropriate documentation received on-site, receiving inspection and tagging for those purchase order items selected.

c. Warehousing

Prior to this inspection the operations QA Group performed a survey and evaluation of the Robinson QA Program and the implementation of that program. The survey results are documented in OQAI-79-1 (R). CP&L is presently in the process of a complete rewarehousing program in the main and bulk storage warehouse to resolve the survey findings. Action Item OQAI-79-11-(R) identified several areas where MI-8, Receiving and Storing certified Parts, was not being implemented. Action Item OQAI-79-16(R) identifies that procedures do not exist to implement the following sections of ANSI N45.2.2: 2.5, 2.6, 2.7, 3, 4, 5.2.2, 5.2.3, 6.2.1, 6.2.4, 6.2.5, 6.2.2, 6.3.1, 6.3.2, 6.3.3, 6.3.5, 6.4.1, 6.4.2, 6.4.3, 6.5 and 7. The inspector examined the findings described by the two action items and concurs with the survey findings. CP&L has corrected several of the line items and many others are in the process of correction. CP&L has committed to complete all line items by June 30, 1980. The June 30, 1980 date appears to be reasonable for the completion of the overall task which include complete rewarehousing establishing a Class 1 storage facility, develop and implementation of procedures to meet the identified ANSI N45.2.2 paragraph requirements. The present system of control, though it does not meet the standard requirements, does appear to provide reasonable control and provide traceability. This matter is identified as inspector followup item 50-261/79-19-19.

13. Housekeeping/Cleaness

- References:
- a) Administration Instructions, Volume I, Revision 30, dated 9/79
 - b) H. B. Robinson Quality Assurance Manual, Volume 11 Revision 16, dated 8/79

a. Plant Housekeeping Inspection

The inspector conducted an inspection of the following areas: control room, diesel generators, safety injection pumps, auxiliary feed water pumps, core flood pumps, refueling water storage tank area, and cable spreading and relay rooms, and found that housekeeping was adequate for the areas of the plant inspected.

As a result of this inspection, the inspector identified one (1) open item discussed in Paragraph 13.b below.

b. Failure to have a Housekeeping Procedure

The inspector identified that the requirements of ANSI N45.2.3-1973 as committed to by the accepted Program have not been implemented in that procedures have not been developed to address Sections 2.3, 2.4, 3, and 4. In discussion with the licensee it was found that the licensee's Operations Quality Assurance inspectors (QQAI-79-15(R) had identified this problem and the scheduled completion date is 1/1/80.

Until the licensee has written, approved and implemented procedures and the NRC has inspected this area this item (261/79-19-20) is open.

14. Offsite Support Staff

- References:
- a) Purchasing Department Guideline for Review of Nuclear Safety Requisitions for Brunswick and Robinson Plants.
 - b) Corporate Nuclear Safety and Quality Assurance Audit Section Procedure CNSP-1, Procedure for Conducting the Independent off-site Nuclear Safety Review Program Required by Federal Regulations.
 - c) Corporate Nuclear Safety Unit Instructions 1-8

a. Program Review

The inspector held discussions with the Manger CNS and QAA, Principal Buffer - Procurement Department and the Supervisor of the Nuclear Safety Unit, and reviewed the referenced procedures. The personnel all appeared to be knowledgeable of their jobs and controlling procedures. The inspector reviewed the qualification records of four (4) Nuclear Safety Review Unit personnel. Additionally he reviewed the QA unit operations audit, QAA/130-2, of the Harris Engineering and Environmental Center on July 24-27, 1979.

During the course of inspection of the Engineering and Construction Group, the QA Auditing Group, (CNS & QAA) Vendor Surveillance, and the Nuclear Fuels Group the inspectors identified no items of noncompliance or deviation.

15. Tests and Experiments

- References:
- a) H. B. Robinson Administrative Manual
 - b) H. B. Robinson Quality Assurance Manual, Volume II

The licensee had not performed any tests/experiments since this area was last reviewed by the NRC. The records required by 10 CFR 50.59(b) for items in this area were reviewed.

As a result of the above reviews, the inspector identified no items of noncompliance or deviations.