



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-261/90-09

Licensee: Carolina Power and Light Company
P. O. Box 1551
Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: April 30 - May 4, 1990

Inspector:

Richard S. Swisher
R. W. Wright

5/17/90
Date Signed

Approved by:

Frank Jape
F. Jape, Section Chief
Quality Performance Section
Division of Reactor Safety

5/17/90
Date Signed

SUMMARY

Scope:

This routine, unannounced inspection was conducted in the areas of receipt, storage, and handling of equipment and materials.

Results:

The licensee appears to be implementing acceptable programs for material receipt, storage and handling. Receiving inspection is doing a good job up front identifying and correcting problems that if gone undetected would eventually lead to potential material traceability problems. The findings and corrective actions recommended by the final material traceability task force report are being implemented.

In the areas inspected, violations or deviations were not identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *R. Barnett, Manager, Outages and Modifications
- *C. Baucon, Senior Specialist, Regulatory Compliance
- J. Beauchamp, Receiving Inspector, Quality Control
- *S. Clark, Supervisor, Procurement Engineering
- F. Dean, Storekeeper, Materials Control Unit
- D. Griggs, Storekeeper, Materials Control Unit
- D. Gulledge, Foreman, Fabrication Shop
- *E. Harris, Manager, Onsite Nuclear Safety
- D. Hickson, Storekeeper, Materials Control Unit
- K. Jowers, Lead Storekeeper, Building 155
- *J. Kloosterman, Director, Regulatory Compliance
- D. Lambert, Engineering Specialist, Quality Assurance
- D. Lisenby, Receiving Inspector, Quality Control
- *G. McCoy, Supervisor, Materials Control Unit
- *R. Morgan, Plant General Manager
- *R. Parsons, Engineering Services Support Manager
- G. Prosser, Contract Specialist/Training Coordinator, Modification Implementation Unit
- *H. Young, Manager, Quality Assurance/Quality Control

Other licensee employees contacted during this inspection included craftsmen, engineers, technicians, and administrative personnel.

NRC Resident Inspectors

- *L. Garner, Senior Resident Inspector
- *K. Jury, Resident Inspector

*Attended exit interview

Acronyms and initialisms used throughout this report are listed in the last paragraph.

2. Receipt, Storage, and Handling of Equipment and Materials (38702)

The inspector examined the following licensee administrative controls for procurement, receiving, inspection, storing, issuing, and the traceability of Plant materials and Equipment:

PE-001,	Rev. 1,	Procurement of Items
PMC-001,	Rev.11,	Procurement of Plant Material and Equipment
PMC-002,	Rev.13,	Receiving Plant Material and Equipment
PMC-003,	Rev.13,	Storing Plant Material and Equipment

PMC-004, Rev.10, Issuing Plant Material and Equipment
OQA-402, Rev.3, Receipt Inspection
MMM-028, Rev.0, Control of Field Issued Material
Final Material Traceability Task Force Report dated February 2, 1990

The inspector ascertained the licensee's implementation of the above mentioned controls by conducting discussions with responsible personnel, by observing work activities underway and by examination of completed work performed by MCU, QC, and craft personnel at the following site locations:

Bulk Storage Warehouse, Bldg. 405
Outside Storage Area 9
Fabrication Shop, Bldg. 445
Chemical Storage, Bldg. 400
Blasting and Paint Shop Bldgs.
Stock Room, Bldg. 155
Warehouse, Bldg. 115

Receipt Inspection

All procurements are delivered and receipt inspected at the Bulk Storage Warehouse Building 405 area. Receipt functions performed by MCU storekeeper personnel for safety-related procurements include inspection for damage, overage/shortage, ensuring that any tests/inspections for acceptance specified in the procurement documents and/or special requirement form were initiated, marking the item or its container for traceability with PO and item number, entering the shelf life expiration date for the items on the Receiving Report, and tag/sticker attached to the item or the bin location, and movement of the safety-related item and related quality documentation to the QC receipt inspection area for their inspection.

Procedures PMC-002 and PMC-004 have been revised recently to require the storekeepers to provide material traceability by marking the material or its container with its PO number, item number, and heat or other identifying numbers if applicable.

QC personnel inspect safety-related procurements to the requirements specified by the procurement document, and/or special materials request form if applicable, and the receiving inspection report (RIR) attributes detailed in Procedure OQA-Revision 3. Receipt inspection is documented on a RIR and the item is tagged or labeled by QC indicating the status of the item. A green colored tag/label indicates an "Accepted Item", yellow denotes an item in a "QA Hold" status, and blue indicates the item may be "Conditionally Released" upon receipt of an approved Conditional Release Request. These QC status tags/labels serve as a second source of material/equipment traceability since they specify in writing the PO and item number, a description and quality level of the item, and the QC receipt inspectors name and date. Nonconforming items remain segregated in the receiving area until the nonconforming condition is either resolved or the item is returned to the vendor.

The inspector observed various safety-related materials, parts and components delivered to the site which were receipt inspected to the above mentioned procedures and found no problem with the methodology employed or its implementation.

Storage and Material/Equipment Traceability

Material/Equipment with an accept tag attached is moved from the QC receipt area by MCU personnel to its designated storage area. Storage Level Classifications used by the licensee are specified in Procedure PMC-003, and are similar to ANSI N45.2.2 levels. Current policy has taken the MIU out of the storage business and designated the MCU as the sole control for all stored material. Former MIC storage areas were consolidated with MCU storage to reduce site storage areas. Field issued material may be staged for installation purposes but is not permitted for extended periods. Unused material is either returned to storage by Procedure PMC-002 or scrapped. Plant Robinson attempts to designate specific areas in its warehouses and laydown yards for safety-related storage items thereby segregating the material/equipment from non-quality items.

The inspector toured and examined the above listed warehouses stockroom and yard storage facilities to determine if appropriate storage levels were being maintained; environmental conditions adhered to; shelf life of susceptible items was being tracked; stored items were properly identified for traceability, protected from damage; and access to storage areas was adequately controlled.

The inspector did note a marginably acceptable storage condition which he identified to the licensee. Seventy-eight feet of 12-inch nonconforming pipe and 760 feet of 6-inch nonconforming pipe (PO 562685, items 1 and 9, RIR 90/0314) were found properly stored on cribbing in Yard 9. The subject pipe was placed in a "Hold Status" due to insufficient documentation.

However, only one length of 6-inch pipe and one length of 12-inch pipe out of approximately 35 pieces of pipe stored on that cribbed area displayed a "Hold" tag. The inspector did note that no other pipe was stored on that cribbed area; the hold tags displayed, properly identified the entire lot of pipe as nonconforming; and access to the padlocked yard was controlled by MCU personnel. The inspector advised the licensee that when only one tag per numerous items is used, good industry practice is to rope off or encircle the entire questionable pipe with yellow and black plastic tape to clearly indicate all the pipe is nonconforming. Discussions with responsible MCU and QC inspection personnel and subsequent review of QC Storage Inspection Report dated April 12, 1990, revealed this matter was licensee identified and considerations are underway to enhance the methodology for controlling the receipt of outside stored materials in a manner similar to the main receiving warehouse.

The inspector examined the deficiencies identified and corrective actions taken for the MCU safety-related monthly warehouse inspections performed during the nine month period of August 1989 through April 1990.

Material and equipment traceability of items was ascertained for the following randomly selected mechanical, electrical, and consumable items found stored at Plant Robinson.

<u>PO Number</u>	<u>Item Number</u>	<u>Description</u>
669376	1	E7012 PE003 Relay 125 VDC
HBR7760	1	Limatorque SM 33-00-15 Actuator
558481	1	Limatorque Motor
HBR7329	1	Cable 4/C, #16, 600V
677228	1	Masterflow Grout
686978	1	RTV Silicone Foam A
332388	1	9" Flex Joint Connection
646646	1	Material, Gasket
647910	1	Electrode, Weld, 7018, 1/8"
610148	1	Sulfuric Acid
685035	1	Bergen Paterson U-Bolts

The inspector verified that the above items had identification markings (PO and item numbers) that were indeed traceable, supported by appropriate corresponding procurement, receipt inspection, and quality documentation that was ascertain to be in the vault.

Issued Material

Structural steel which was properly stamped with identification at receipt inspection and later issued to the fabrication and paint shops where it had been cut into several smaller pieces was examined by the inspector for proper transfer of traceability data as specified by procedure MMM-028 and found satisfactory.

It is apparent that licensee craft personnel have been trained to procedure MMM-028. However, since material control and traceability of field issued material is the responsibility of the personnel responsible for its use in the field, "Contract Personnel" would also have to be trained to this procedure. The inspector conducted discussions with the MIU Contract Specialist/Training Coordinator concerning this matter. The inspector verified that Contract Personnel were required to received training in procedure MMM-028 prior to performing any work. Furthermore, successful understanding of this procedure is supported by passing a written examination. Proper implementation of material traceability at the site (Contractor and licensee personnel) is being monitored by QA/QC inspection.

QA/QC Surveillance/Monitoring/Inspections

The inspector observed a portion of licensee QA Surveillance 90-35, concerning material traceability which had commenced the same week as his inspection. Discussions with the QA/QC Manager prior to leaving the site disclosed that no adverse findings were identified by the subject surveillance.

The inspector examined the results of seven other recent QC Monitor Reports and Inspections performed on material traceability. One minor discrepancy (FR 90-094) identifying angle iron left in the fabrication shop two days without establishing a controlled staging area was identified. This matter was immediately corrected and resulted in no loss of traceability.

Receiving Inspection Trend Analyses Reports were examined by the inspector. These reports in conjunction with the inspectors personal observation of the receiving inspection process indicate that MCU and QC are doing a good job up front identifying and correcting problems that would have eventually lead to potential material traceability problems if they had gone undetected.

Within the area, no violations or deviations were identified.

3. Exit Interview

The inspection scope and results were summarized on May 4, 1990, with those persons indicated in paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results. Proprietary information is not contained in this report.

4. Acronyms and Initialisms

ANSI	American National Standards Institute
BLDG	Building
FR	Field Report
MCU	Material Control Unit
MIU	Modification Implementation Unit
MMM	Maintenance Management Manual
OQA	Operations Quality Assurance
PE	Procurement Engineering
PMC	Procurement and Materials Control
PO	Purchase Order
QA	Quality Assurance
QC	Quality Control
RIR	Receiving Inspection Report

NRC Form 700
11-811
12 MC 0526

INSPECTOR'S REPORT
Office of Inspection and Enforcement

R. CARROLL

REVIEWER
F. JAPE

INSPECTORS
R. W. WRIGHT

LICENSEE/VENDOR CP&L - H.B. ROBINSON 2	TRANSACTION TYPE	DOCKET NO. (NRC Reg. OR LICENSE NO. (BY PRODUCT)) (NRC Reg. OR LICENSE NO.)	REPORT NO. SEQ. MO. YR.		NEXT INSP. DA. MO. YR.	
	<input checked="" type="checkbox"/> I - INSERT <input type="checkbox"/> M - MODIFY <input type="checkbox"/> D - DELETE <input type="checkbox"/> R - REPLACE	05000261	9109	A		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY						ORGANIZATION CODE OF REGION/NO. CONDING ACTIVITY (See NRC 0530 - Worksheet for Reg. - Property Makeover Reporting for code)		
FROM			TO			<input checked="" type="checkbox"/> 1 - REGIONAL OFFICE STAFF			<input type="checkbox"/> OTHER			REGION	DIVISION	BRANCH
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REGIONAL ACTION (Check one box only)				TYPE OF ACTIVITY CONDUCTED (Check one box only)															
<input type="checkbox"/> 1 - NRC FORM 801				<input checked="" type="checkbox"/> 02 - SAFETY				<input type="checkbox"/> 06 - MGMT VISIT				<input type="checkbox"/> 10 - PLANT SEC.				<input type="checkbox"/> 14 - INQUIRY			
<input checked="" type="checkbox"/> 2 - REGIONAL OFFICE LETTER				<input type="checkbox"/> 03 - INCIDENT				<input type="checkbox"/> 07 - SPECIAL				<input type="checkbox"/> 11 - INVENT VER.				<input type="checkbox"/> 15 - INVESTIGATION			
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INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2.730 INFORMATION				LETTER OR REPORT TRANSMITTAL DA									
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2 - VIOLATION																									
3 - DEVIATION																									
4 - VIOLATION & DEVIATION																									

TYPE	MODULE NUMBER	INSP	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ FOLLOWUP				REC ORG	TYPE	MODULE NUMBER	INSP	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ FOLLOWUP				
							PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL									PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	
	530703		A	0,0,2																			
ENT & Exit																							
	538702		A	0,4,0	1,0,0	C																	
Receipt, Storage, and Handling of EQ & Mat's Program																							

© CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

INSPECTOR'S REPORT (Continuation)

Office of Inspection and Enforcement

NO.	SEQ.	VIOLATION SEVERITY OF DEVIATION					
		1	2	3	4	5	6
	A						
	B						
	C						
	D						

VIOLATION OR DEVIATION (Enter up to 200 characters for each item. If the text exceeds this number, it will be necessary to continue. Limit lines to 60 characters each.)

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INSPECTION RESULTS AND SALP INPUT

Summary of Inspection Results

Facility H.B. ROBINSON 2

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AREAS INSPECTED

Receipt, Storage, and Handling of Equipment and Materials

NEW VIOLATIONS (SL), DEVIATIONS (DEV), OR OTHER NEW ITEMS (UNR & IFI)

None

STATUS OF PREVIOUS ENFORCEMENT MATTERS AND OTHER ITEMS

None

MODULES INSPECTED, PERCENT FOR EACH UNIT (IF NOT 100%, LIST NUMBER OF LINE ITEMS COMPLETED)

538702 - 100%

INSPECTOR OBSERVATIONS AND AREAS OF CONCERN

The licensee appears to be implementing acceptable programs for material receipt, storage and handling. Receiving inspection is doing a good job up front identifying and correcting problems that if gone undetected would eventually lead to potential material integrity problems. The findings and corrective actions recommended by the Final Material Reliability Task Force Report are being implemented.

SALP EVALUATION

Complete one SALP evaluation for each functional area inspected. Complete during inspection if time permits.

Key: 0 - Not inspected; 1 - Above average; 2 - Average; 3 - Below average

EVALUATION CRITERIA	ASSESSMENT
1. Management involvement in assuring quality	0 1 (2) 3
2. Resolution of technical issues from a safety standpoint	0 1 2 3
3. Responsiveness to NRC initiatives	0 1 2 3
4. Enforcement history	0 1 2 3
5. Reporting and analysis of reportable events	0 1 2 3
6. Staffing (including management)	0 1 (2) 3
7. Training and qualification effectiveness	0 1 2 3
AREA INSPECTED	OVERALL ASSESSMENT 0 1 (2) 3

COMMENTS:

_____ See front Page Observations _____

NOTE: Please attach additional sheets if needed for comments or for other SALP functional areas.

LEAD INSPECTOR Robert W. Wright

DATE 5/14/90

DISTRIBUTION
Branch Chief
Section Chief
Project Section Chief (for reactor inspections)