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 RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in Insp Rept 50-261/90-24.
 Corrective actions: verification of accuracy of inservice
 insp isometric sketches will be performed during first
 period of third 10-yr interval.

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Carolina Power & Light Company

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RNPD/90-4132

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/90-24; REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the notice of violation identified by NRC Inspection Report No. 50-261/90-24:

Severity Level IV Violation (RII-90-24-01)

10 CFR 50, Appendix B, Criterion V as implemented by Carolina Power and Light Company Corporate Quality Assurance Manual, Section 6, paragraph 6.3.2 requires that, the accomplishment of activities affecting quality shall be in accordance with approved procedures and/or drawings which are appropriate to the circumstances.

Contrary to the above, on October 3, 1990, the inspector observed that an inservice inspection isometric sketch (No. CP&L-234B) did not accurately depict the actual pipe configuration in that, three welds were not shown for the piping run illustrated. Subsequent review by the licensee established that similar errors existed on other isometric sketches. Inaccurate isometric sketches could result in an inadequate total weld population subject to inservice inspection and could result in nondestructive examiners performing inservice inspections on incorrect welds.

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1. The Reason for the Violation

The cause of this violation is attributed to the fact that the drawings used to select the welds to be inspected had not been updated to reflect the as-built configuration of the piping. As these drawings have continued to be used for the ISI program, it was not recognized that because not all welds are shown, the possibility existed for the nondestructive examiners to inspect the wrong weld.

The selection criteria used at H. B. Robinson for Class 1 and 2 weld examinations is based on 10 CFR 50.55a, which allows for the use of the rules contained in the 1974 edition through the 1975 summer addenda of Section XI of the ASME Code for the extent of the examination. In establishing the program for the second ten year inspection interval, H. B. Robinson utilized a conservative accounting method based on drawing review to identify the weld population to be examined.

2. The Corrective Steps That Have Been Taken and the Results Achieved

The Isometric Sketch discussed in the violation was walked down in the field following the inspector's findings and revised accordingly. This walkdown and subsequent revision of the weld count resulted in the determination that, based on the conservative counting method used in the development of the second ten year interval program, an adequate number of welds had in fact been selected for examination in the original program. In that the Code only requires that a percentage of the total weld population be selected, and that the required percentage was met, a violation of the Code does not exist. Therefore, further immediate corrective action is not required.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

The methodology for selection of the number of welds for inspection will be continued to assure that an adequate and conservative population is identified. In order to preclude additional violations of this nature, verification of the accuracy of the ISI isometric sketches will be performed during the first period of the third ten year interval. This verification will include a physical walkdown as well as other means as may be determined appropriate, and will be followed by drawing revision as necessary.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved during the first period of the third ten year interval, which is presently scheduled to start no later than February, 1992, and end in June, 1995.

Letter to U.S. Nuclear Regulatory Commission
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Should you have any questions regarding this matter, please contact
Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours


Charles R. Dietz
Manager

Robinson Nuclear Project Department

RDC

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO