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

Report No.: 50-261/88-17

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: June 27 - July 1, 1988

Inspectors: J. L. Coley 7-26-88
J. L. Coley Date Signed

G. A. Hallstrom for J. L. Coley 7-26-88
G. A. Hallstrom Date Signed

Approved by: for Vicke Economou 7-26-88
J. J. Blake, Chief Date Signed
Materials and Processes Section
Engineering Branch
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection was in the areas of hydrostatic testing - review of program, review of procedures and completed records.

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

Programmatic strengths were demonstrated relative to resolution of technical issues. However, a potential for weakness relative to management involvement and responsiveness to NRC initiatives is indicated by new Inspector Followup Item (IFI) 261/88-17-01, Enhancement of Programmatic Procedures for Hydrostatic Testing.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*S. Clark, Project Engineer, Design Engineering
*J. Curley, Director, Regulatory Compliance
*W. Flanagan, Manager, Modification Projects
*E. Harris, Jr., Director, Onsite Nuclear Safety
*R. Morgan, Plant General Manager
*S. Pruitt, Inservice Inspection (ISI) Coordinator
*D. Saye, Regulatory Compliance
*D. Weber, Specialist, Technical Support
*H. Young, Director, Quality Assurance (QA)/Quality Control (QC)

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

NRC Resident Inspector

*L. Garner, Senior Resident Inspector

*Attended exit interview

2. Inservice Inspection (ISI) - First and Second Interval Program and Records Review (73051, 73755, 73052)

The inspector examined documents, activities and records as indicated below to determined whether ISI was being conducted in accordance with applicable procedures, regulatory requirements, and licensee commitments.

The Carolina Power and Light Company ISI program for the H. L. Robinson facility is conducted in accordance with requirements of Paragraph 4.0.5 of the Technical Specifications, which invokes the requirements in 10 CFR 50.55a(g) as to applicable ASME Code Addenda and specific written Relief as granted by the Commission.

ISI Nondestructive Examinations and hydrostatic tests must be completed during each of four ten-year intervals calculated from the starting date of commercial operation (March 7, 1971). Section XI of the ASME Code allows up to one year's extension of the interval to enable correspondence with a plant's outage schedule and the final completion date of the first interval examination and testing was March 7, 1982.

The applicable code for hydrostatic testing for both first and second intervals is the ASME B&PV Code, Section XI, 1977 Edition with Addenda through Summer 1978.

CP&L is presently starting the third and final period of their second interval. Since all hydrostatic testing at the Robinson Facility is conducted in the third period of the interval no second interval hydrostatic testing has been initiated. Therefore, the inspectors were required to review the testing performed in the first inspection interval in order to obtain a clear perspective of testing which has been performed. The extent of the inspector's review is delineated below.

a. Inservice Inspection, Programmatic Review, Unit 2 (73051)

The inspectors reviewed the below listed documents relating to the licensee's Inservice Inspection Program for the first interval in the areas of: program approval; QA program requirements including organizational structure; audit requirements; general QA requirements (examination reports, control of deviations from established program; quality documentation and identification of components); work and quality inspection procedures; control of processes; corrective action; document control; control of examinations and examination equipment; quality records; inspection scope; inspection intervals; personnel qualifications; and, NDE records including provisions for storage.

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Plant Procedure No.	Title
PLP-025, Rev. 2	Inservice Inspection Program
AP-009, Rev. 5	Special Procedures
TMM-004, Rev. 18	Inservice Inspection Testing
TMM-015, Rev. 6	Inservice Inspection Repair and Replacement Program
TMM-016, Rev. 3	Inservice Inspection Repair and Replacement Program Hydrostatic and Pneumatic Testing Requirements for Class 1, 2, and 3 Systems and Components
TMM-020, Rev. 2	Inservice Inspection Pressure Testing

During the above review the inspectors noted that the program procedures did not reflect corporate policy stated in July 31, 1987, correspondence (File B-X-0202) from Mr. S. R. Zimmerman regarding ISI - Related Relief Requests. Present CP&L policy requires NRC approval before implementation of requested relief. The new policy would have precluded CP&L's failure to secure NRC approval for relief from interior clad examinations (RV closure head and manway areas in Steam Generator and Pressurizer Bottom Heads).

The above relief request was discovered by the inspectors included in the January 13, 1983, ninety day inservice inspection report to Region II, but never submitted for approval to the office of Nuclear Reactor Regulation (NRR) in conformance with 10 CFR 50.55a.(3).

Cognizant licensee personnel agreed to notify NRR and provide the inspectors with documentation verifying that the relief request had been transmitted to NRR. Cognizant licensee personnel also committed to further enhancement of programmatic procedures as quickly as practical. The inspectors informed cognizant licensee personnel that the need for additional NRC review of the enhanced procedures would be identified by Inspector Followup Item 261/88-17-01, Enhancement of Programmatic Procedures for Hydrostatic Testing.

The inspectors also noted that the new corporate policy would require sufficient engineering analyses and attendant documentation to preclude concern regarding lack of NRC approval of "code waivers" as identified during a previous inspection (See NRC Inspection Report No. 50-216/88-14) and resolved during this inspection (See Paragraph 3b).

b. Review of Hydrostatic Test Procedures and Evaluation of Test Data

The inspectors continued the earlier review of the ASME Classes 2 and 3 hydrostatic test procedures listed below for technical content. Test procedures were integrated on a sample of system drawings to determine that the hydrostatic boundaries included all of the system involved in the program. In addition verification of the alternate testing in accordance with code approved programmatic deviations, "code waivers" was also completed.

System & Test Procedure No.	Special Procedure No.	Test Blocks Integrated	Program Waiver No.
Feedwater FW-3/2	SP-370	TB #1 thru TB #7	2,7B & 9
Service Water SW-3/2	SP-375	TB #1, TB #1A, and TB #3	--
Service Water SW-3	SP-374	TB #1 thru TB #9	10
Chemical & Volume Control CVCS-3	SP-376	TB #1 thru TB #28	2,4,5,11,12, & 13
Component Cooling Water CCW-3/2	SP-369	TB #1 thru TB #7	8

The inspectors concluded from the reviewed documentation that the systems selected for review had been completely tested. Also, the contractor had written excellent test procedures. All valves in the test were identified properly aligned and documented clearly. Changes to the procedures were well documented and approved. The technical content was adequate and presented in an organized manner. Test boundaries were properly identified and exceptions and discrepancies were clearly addressed. All contractor activities appeared to be conservative and executed technically in an effective manner.

Within the areas examined, violations or deviation were not identified.

3. Action on Previous Inspection Findings (92701)

a. (Closed) Severity Level IV Violation 50-261/87-07-01, ISO Drawing Discrepancy. Carolina Power and Light Company's letter of response dated July 14, 1987, has been reviewed and determined to be acceptable by Region II. The inspectors held discussions with the Inservice Inspection Coordinator and examined the corrective actions as stated in the letter of response. The inspectors concluded that CP&L had determined the full extent of the subject noncompliance, performed the necessary survey and followup actions to correct the present conditions, and developed the necessary corrective actions to precluded recurrence of similar circumstances. The corrective action identified in the letter of response has been implemented.

b. (Closed) Unresolved Item 50-261/88-14-01, Licensee Review of Contractor "Code Waivers". CP&L had contracted Gilbert and Associates to develop the first interval hydrostatic test program for Unit 2. Gilbert and Associates were required to walk down the systems, write the test procedures, perform the hydrostatic tests, and furnish CP&L a final report of the testing performed. An inspector review of the final report revealed that the contractor had also identified 18 waivers to the ASME, Boiler and Pressure Vessel Code, Section XI. Only two of the eighteen waivers had been identified to NRC's Office of Nuclear Reactor Regulations with relief from the code requirements requested. The identifying inspector had held a meeting on June 16, 1988, with cognizant CP&L personnel to determine whether any of the waivers would require plant shutdown or justification for continued operation. The licensee did not have time prior to the June 16th, meeting to complete their analysis so only waivers that appeared to have the greatest affect on operation or for which no alternate testing was performed, were discussed. The inspector concluded from information presented on June 16th that the waivers discussed represented deviations from CP&L's Hydrostatic Test Program not the ASME Code.

Since all the waivers were not evaluated at that time the need for further NRC review was identified by this unresolved item.

On June 27, 1988, the inspectors arrived at the Robinson Facility to address the analyses of the remaining waivers. A meeting was held with the CP&L's cognizant personnel and information discussed revealed that the remaining waivers were also deviations from the hydrostatic test program, but not the ASME Code.

The two meetings with the licensee established that CP&L's final test report transmitted to Region II on January 13, 1983, had improperly identified the waivers as deviations from the ASME Code, when in fact they were CP&L's method of identifying deviations from their hydrostatic program. The inspectors reviewed the hydrostatic test program and determined it to be a very conservative program, executed in an outstanding manner. The inspectors determined that the waivers were based on good engineering determinations and in all but four cases, alternate testing was performed. The licensee was cautioned, however, concerning observed weaknesses in documentation submitted to the NRC. This item is considered closed.

4. Exit Interview

The inspection scope and results were summarized on July 1, 1988, with those persons indicated in paragraph 1. The inspectors described the areas inspected and discussed in detail the inspection results listed below. Dissenting comments were not received from the licensee.

(Open) Inspector Followup Item, 50-261/88-17-01, Enhancement of Programmatic Procedures For Hydrostatic Testing.