



Carolina Power & Light Company 10 : 11

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

JUL 26 1984

Robinson File No: 13510E

Serial: RSEP/84-495

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W.
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSEE NO. DPR-23
IE INSPECTION REPORT IER 84-22

Dear Mr. O'Reilly:

Carolina Power and Light Company has received and reviewed the subject report and provides the following response.

Severity Level V Violation (IER-84-22-01-SL5)

10 CFR 50 Appendix B Criterion V requires activities affecting quality be accomplished in accordance with procedures. ASME B&PV Code, Section III, Subsection NB, paragraph NB-4231.2(e), CB&I - Procedure CUP-1X, Revision 2, "Plate Cleanup Procedure," paragraph 3.4 and Cooperheat Procedure 4651-CHP-006, Rev. 1, "Upper Girth Joint Extended Zone Post Weld Heat Treat," paragraph 4.4, requires temporary attachments be marked prior to removal such that the marking will remain after removal to identify the removal sites for the required surface examination.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that temporary attached thermocouples for the upper girth weld on "C" steam generator were not marked before removal such that the markings remained after the thermocouple removal.

RESPONSE

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

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2. Reason for the Violation

This occurrence involves two contractors. The first performed the Post Weld Heat Treatment (PWHT contractor) and the second the clean-up and magnetic partial (MT) examination of the thermocouple removal areas after PWHT (NDE contractor).

The NDE contractor ground the areas when the temporary thermocouples were attached. The thermocoupling markings were removed during this grinding. However, using the grinding marks, which covered the area requiring MT, and a thermocouple location map provided by the PWHT contractor, the NDE contractor successfully performed the MT. The violation occurred because the areas to be MT inspected were not marked such that the marks remained until the areas were MT inspected. The NDE contractor should have remarked the areas to ensure the markings remained after the grinding was completed.

3. Corrective Steps Which Have Been Taken

For the remaining thermocouple removals, the PWHT contractor marked all thermocouple locations immediately adjacent to the thermocouples, and the NDE contractor remarked the areas as required to ensure the markings remain after the grinding has been completed.

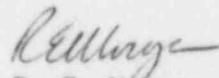
4. Corrective Steps Which Will Be Taken

The corrective steps above were adequate to prevent further violation. No further steps are planned.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson SEG Plant

CLW/sr