



Carolina Power & Light Company

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

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Robinson File No: 13510E

Serial: RSEP/84-406

Mr. James P. O'Reilly  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
Atlanta, Georgia 30303

H. B. Robinson SEG Plant, Unit 2  
Docket No. 50-261  
License No. DPR-23  
IE Inspection Report IER-84-11

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

Severity Level V Violation (IER-84-11-01-SL5)

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances, and that these instructions or procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Section III of the ASME Code, states that, "each certificate holder is responsible for control of the welding electrodes and other material which is used in the fabrication and installation of components. Suitable identification, storage, and handling of electrodes, flux, and other welding material shall be maintained. Precautions shall be taken to minimize absorption of moisture by electrodes."

CP&L's Procedure for Storage and Control of Welding Filler Metal and Backing Rings WP-502, Rev. 10, establishes a maximum exposure time for E70XX series welding rods of four hours and a maximum exposure time of E80XX series welding rods of two hours. Paragraph 4.10 of the licensee's procedure WP-502 requires that, when the maximum exposure time has been exceeded the rods shall be returned to the control areas for reconditioning.

Contrary to above, the procedure does not segregate weld rods that have been issued and returned within their exposure limits. Therefore, these weld rods can be reissued immediately and a E70XX series weld rod with a maximum exposure limit of four hours could receive a exposure of seven hours in an eight hour shift.

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Response

1. Admission or Denial of the Alleged Violation

CP&L denies the alleged violation.

2. Reason for Denial of the Alleged Violation

ASME Section III requires control of welding electrodes and CP&Ls procedure WP-502 revision 10, in effect at the time of this inspection, established the control of welding electrodes.

WP-502 revision 10 provided control to minimize absorption of moisture by welding electrodes.

ASME Section III does not address reconditioning electrodes nor does it specify electrode exposure times. CP&L's procedure WP-502 revision 10 went beyond the requirements of ASME Section III and requires that the electrodes exposed to the atmosphere for greater than the time specified in table 4.9.1 to be reconditioned. WP-502 revision 10 also allowed electrodes which were exposed for less than the time specified in table 4.9.1 to be placed back into the issue ovens. CP&L believes that the time specified was conservative. Not segregating the welding rods that have been returned to the issue ovens because they were exposed less than the time specified in table 4.9.1 is not in violation of the requirements or intent of ASME Section III.

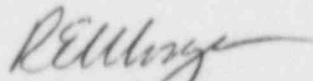
3. Actions Which Have Been Taken

In order to alleviate any concern the NRC may have on control of welding electrodes, CP&L has made the following conservative changes to WP-502 in revision 11.

- A. Coated electrodes returned to the issue station which were not issued in a portable rod caddy will be destroyed regardless of exposure time.
- B. Coated electrodes issued in a portable rod caddy shall be used or destroyed once they have been removed from the caddy.

If you have any questions concerning this response, please contact me or my staff.

Very Truly yours,



R. E. Morgan  
General Manager

H. B. Robinson SEG Plant