

yellow

JUN 29 1984

Carolina Power and Light Company  
ATTN: Mr. E. E. Utley  
Executive Vice President  
Power Supply and Engineering  
and Construction  
411 Fayetteville Street  
Raleigh, NC 27602

Gentlemen:

SUBJECT: REPORT NO. 50-261/84-11

Thank you for your response of June 8, 1984, to our Notice of Violation issued on May 10, 1984, concerning activities conducted at your Robinson facility.

After careful consideration of the basis for your denial of the violation, we have concluded, for the reasons given in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. Therefore in accordance with 10 CFR 2.201(a), please submit to this office within 30 days of the date of this letter a written statement that describes (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

The response directed by this letter is not subject to the clearance procedure of the Office of Management and Budget issued under the Paperwork Reduction Action of 1980, PS 96-511.

We appreciate your cooperation in this matter.

Sincerely,

*RS*

Richard C. Lewis, Director  
Division of Reactor Projects

Enclosure:  
Staff Assessment of Licensee Response

cc w/encl:  
G. P. Beatty, Jr., Manager  
Robinson Nuclear Project Department  
R. E. Morgan, Plant General Manager

bcc w/encl:  
NRC Resident Inspector  
Document Control Desk  
State of South Carolina

8408290031 840807  
PDR AD0CK 05000261  
G PDR

RII  
*JC*  
JCooley:dr  
6/25/84

*JB*  
JBake  
6/27/84

RII  
*AH*  
AHerd  
6/27/84

RII  
*JOS*  
JOLshinski  
6/27/84

RII  
*DV*  
DVerrelli  
6/28/84

*RL*  
RII  
*RL*  
RLewis  
6/29/84

ENCLOSURE

STAFF EVALUATION OF CP&L RESPONSE  
(VIOLATION 50-261/84-11-01)

A review of the Notice of Violation establishes the following pertinent points for consideration:

- A. Section III of the ASME Code requires control of welding electrodes and also states that precautions shall be taken to minimize absorption of moisture by electrodes.
- B. CP&L technical staff wrote procedure WP-502 to establish the means by which CP&L would control electrodes (including guidance to minimize absorption of moisture by electrodes).
- C. CP&L's procedure WP-502, Revision 10, establishes a maximum exposure time for E70XX and E80XX electrodes, and requires that when the exposure time has been exceeded the rods shall be returned to control areas for reconditioning.
- D. CP&L's procedure WP-502, Revision 10, does not provide requirements for segregation of returned electrode for the reconditioning required by paragraph 4.10.

As one can see by this review, the ASME Code requirement on electrode moisture control is in the form of a general precaution. CP&L took this precaution and established a specific electrode exposure time as the means to ensure that the precaution was met.

The staff agrees that there was no violation of the ASME Code requirements. (From a purely technical point of view, the staff feels that the exposure times listed in WP-502, Revision 10 were very conservative).

The fact remains that the CP&L technical staff established exposure time limits for E70XX and E80XX electrodes, and then wrote a procedure which contained a loop-hole by which the time limits could be exceeded. This was compounded by the fact that CP&L's Quality Assurance and Plant Safety organizations reviewed and approved the procedure without recognizing that it was incomplete.

The reason for the citation was not the issue of moisture control in welding electrodes; but rather, the more important issue of how the procedure went through the required review cycle without someone questioning what the reconditioning required by paragraph 4.10 consisted of, and how it was to be controlled to preclude violating the exposure time requirements established by the CP&L technical staff.