



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

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JUL 11 1984

Robinson File No: 13510E

Serial: RSEP/84-471

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
IE INSPECTION REPORT IER-84-20

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 5 Violation IER-84-20-01-SL5

10 CFR 50, Appendix B, Criterion IX requires measures be established to assure that special processes including welding are controlled. Chicago Bridge and Iron Company QA Program, Division 4, Section 8.0, paragraph 8.2.2.1, requires welding filler material types to be segregated. Carolina Power and Light Company Procedure WP-502, Revision 11, "Storage and Control of Welding Filler Material and Backing Rings," Paragraph 4.3.2, requires welding filler material type to be specified on the welding filler material request.

Contrary to the above, special process-welding was not adequately controlled in that the following examples were noted:

- a. Type ER-80S-D2 welding filler material was mixed with type ER-70S-2 welding filler material in the CB&I rod issue station.
- b. A weld material requisition for type 316-insert material used on reactor coolant system weld RC-113 did not specify the material type.
- c. The Carolina Power and Light Company Program did not have a requirement in their program to prohibit the mixing of welding filler material types.

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RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason for the Violation

a&c) The different weld filler material should have been segregated. Although the controlling procedure, WP-502, did not specify to separate the weld filler material, the rod room attendants had been directed to segregate welding material by type and size in the holding ovens and bins. The rod room attendant made an error in not segregating the material.

b) Those issuing the type 316-insert missed specifying the type of insert material on the Weld Material Requisition (WMR). Although the type of insert material was omitted, the insert issued was traceable by the heat number. It was the only size and type of insert that was maintained in the rod room at the time. Also, the inserts were ordered for the particular job for which they were being used.

3. Corrective Steps Which Have Been Taken

a&c) Procedure WP-502 has been revised to specify that welding material shall be segregated by type and size in the ovens and bins. In addition, it has been discussed with the rod room attendants to take more caution in placing welding material in the proper ovens and bins. Numerous inspections of the rod rooms by the rod room foreman, rod room supervisors, and QA personnel have not shown any recurrence of this incident. Rod room attendants are inspecting their assigned rod room at the beginning of each shift to assure compliance with WP-502.

b) The rod room attendants, foremen, and supervisors have discussed the need to ensure the WMRs are properly completed.

4. Corrective Steps Which Will Be Taken

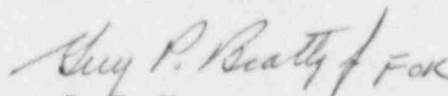
No further action is considered necessary.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

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

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson SEG Plant

CLW/sr

cc: R. C. DeYoung