



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550  
AUG 3 1984

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Robinson File No: 13510E

Serial: RSEP/84-499

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 REV. 1

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

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

- a. Division 4, Section 8.0, paragraph 8.2.2.1 of the CBI QA Manual requires welding filler material types to be segregated. A couple of weld filler wires were apparently returned to the wrong bin location in the CBI rod station. Filler wires are labeled and the inspector identified that ER-80S-D2 filler wire was mixed with ER-70S-2 filler wire in the CBI rod station.

Division 4 Section 8.0, paragraph 8.5.2.6 of the CBI QA Manual states that the weld pusher (welding supervisor) shall control the use and distribution of welding material. Welders request filler wire from weld pushers who ensures the proper filler wire for a specific weld is distributed to the welder. This assures that the proper filler wire is used in a weld and therefore, this violation should not effect the adequacy of welds in the field.

- b. Those issuing the type 316 insert, used on RC-113, 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.
- c. Although the CP&L rod room attendants had been directed to segregate welding material by type and size in the holding ovens and bins, the Welding Material Control Procedure, WP-502, did not specify this requirement. This was an oversight in the procedure.

3. Corrective Steps which Have Been Taken

- a. The filler wire in the CBI Rod Station was properly segregated. It was discussed with the appropriate CBI supervision that electrode control, storage, issue and return per the CBI QA Manual are their responsibility. The appropriate CBI supervision were reminded of the segregation requirement in the CBI QA Manual.
- b. CP&L rod room attendants, foreman and supervisors have discussed the need to ensure the WMRS are properly completed.
- c. WP-502 has been revised to specify that welding material shall be segregated by type and size in the ovens and bins.

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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

FMG/ml