



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report No.: 50-261/84-33

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: September 10 - 12, 1984

Inspector: *W. P. Kleinsorge*
W. P. Kleinsorge

Sept 21, 1984
Date Signed

Approved by: *J. J. Blake*
J. J. Blake, Section Chief
Engineering Branch
Division of Reactor Safety

9/25/84
Date Signed

SUMMARY

Scope: This routine unannounced inspection involved twenty-four inspector-hours on site in the areas of licensee action on previous enforcement matters, preservice inspection (PSI)/inservice inspection (ISI), and inspector followup items.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Licensee Employees Contacted

- *R. E. Morgan, General Manager
- *G. P. Beatty, Project Manager
- H. P. Beane, NDE Specialist
- *J. C. Sturdavant, Regulatory Compliance
- *C. Wright, Regulatory Compliance
- *W. Farmer, Performance Engineering
- *R. Webber, Performance Engineering

Other licensee employees contacted included engineers, technicians and office personnel.

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on September 12, 1984, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

(Open) Inspector Followup Item 261/84-33-01: "ISI QA Program Approval" - paragraph Nos. 5a(1) and 5b(1)

3. Licensee Action on Previous Enforcement Matters

- a. (Closed) Violation 261/84-20-01: "Failure to Establish Adequate Controls for Welding Filler Materials"

CP&L letters of response dated July 11 and August 3, 1984, have been reviewed and determined to be acceptable by Region II. The inspector held discussions with the cognizant engineer and examined the corrective actions as stated in the letters of response. The inspector concluded that CP&L had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present condition, and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letters of response have been implemented.

- b. (Closed) Violation 261/84-22-01: "Failure to Follow Temporary Attachment Procedure"

CP&L letter of response dated July 26, 1984, has been reviewed and determined to be acceptable by Region II. The inspector held discussions with the cognizant engineer and examined the corrective

actions as stated in the letter of response. The inspector concluded that CP&L had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions, and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

- c. (Closed) Unresolved Item 261/84-22-02: " Visual Inspection Procedure Failure to Address All Required Attributes For Socket Welds"

The licensee has amended CP&L-NDEP-603 to reflect all required socket weld inspection attributes. The inspector determined that no misinspection was likely to have resulted from the omission. This matter is considered closed.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Preservice Inspection (PSI)/Inservice Inspection (ISI)

The inspector examined documents, activities and records as indicated below to determine whether PSI and ISI were being conducted in accordance with applicable procedures, regulatory requirements, and licensee commitments. The applicable code for PSI/ISI is ASME B&PV Code Section XI, 1977 edition with addenda through summer 1978.

a. Review of Program (73051B)

- (1) The inspector reviewed the below listed documents to ascertain whether the PSI/ISI program had been approved by the licensee, and whether adequate QA plans and procedures had been established (written, reviewed, approved and issued) to assure that organization structure and QA personnel, audits, general QA requirements, work and quality inspections procedures, control of processes, corrective action, document control, examination control and control of examination equipment, quality records, and qualification of personnel were controlled and accomplished. The following documents were examined:

<u>Document Identification</u>	<u>Title</u>
<u>W</u> - PA 2.1, Rev. 4	"Product Assurance Department Procedures Program"
<u>W</u> - PA 4.2, Rev. 1	"QA Engineering Review of Equipment Specifications"

<u>W</u> - PA 5.1, Rev. 4	"Product Assurance Review of Procurement Documents and Manufacturing Order Transmittals"
<u>W</u> - PA 6.1, Rev. 0	"Quality Planning"
<u>W</u> - PA 7.2, Rev. 4	"Product Assurance Review of Technical Documents"
<u>W</u> - PA 7.3, Rev. 0	"Product Assurance Review of Field Change Notices (FCNs)"
<u>W</u> - PA 7.4, Rev. 0	"Product Assurance Review of Field Deficiency Reports (FDRs)"
<u>W</u> - PA 8.2, Rev. 3	"Supplier Surveillance"
<u>W</u> - PA 8.3, Rev. 1	"Customer Source Surveillance of NSID Suppliers"
<u>W</u> - PA 8.5, Rev. 3	"Supplier Evaluation and Approval"
<u>W</u> - PA 8.6, Rev. 0	"Authorized Nuclear Inspector Hold Points at NSID Vendor/ Subcontractors"
<u>W</u> - PA 10.0, Rev. 0	"Product Assurance Indoctrination and Training"
<u>W</u> - PA 10.1, Rev. 8	"Training, Qualification, and Certification of Personnel in Nondestructive Examination"
<u>W</u> - PA 10.2, Rev. 2	"Certification of Inspection Personnel for Nuclear Power Plants"

<u>W</u> - PA 10.3, Rev. 0	"Qualification and Certification of Visual Examination Personnel for Inservice Inspection"
<u>W</u> - PA 10.4, Rev. 0	"Training, Qualification and Certification of Auditing Personnel"
<u>W</u> - PA 14.1, Rev. 1	"Handling, Storage, Shipping, and Receiving (Policy)"
<u>W</u> - PA 15.1, Rev. 1	"Inspection, Test and Operating Status (Policy)"
<u>W</u> - PA 16.1, Rev. 1	"Control of Nonconforming Material Deviation Notices"
<u>W</u> - PA 17.2, Rev. 5	"Internal Corrective Action"
<u>W</u> - PA 18.1, Rev. 2	"Record Retention Control"
<u>W</u> - PA 18.3, Rev. 3	"NSID Quality Releases"
<u>W</u> - PA 19.1, Rev. 3	"External Audits of NSID"
<u>W</u> - PA 19.2, Rev. 6	"Internal Audits of NSID"
<u>W</u> - PA 19.3, Rev. 4	"QA Audits of Suppliers"
B&W - ISI-1, Rev. 5	"Administrative Procedure for Control of Inservice Inspection Procedures and Procedure Qualification"
B&W - ISI-2, Rev. 5	"Administrative Procedure for Records Management"
B&W - ISI-24, Rev. 5	"Personnel Qualification - Eddy Current Examination"

B&W - ISI-61, Rev. 18	"Administrative Procedure for Control of Manuals and Reports"
B&W - ISI-62, Rev. 3	"Administrative Procedure for Control of Documents"
B&W - ISI-63, Rev. 7	"Administrative Procedures for Approval of B&W Manuals for Baseline and Inservices Inspection Programs"
B&W - ISI-76, Rev 13	"Administrative Procedure for the Design, Fabrication, and Certification of Calibration Standards"
B&W - ISI-78, Rev. 8	"Administrative Procedure for Tagging and Correction of Nonconforming Items"
B&W - ISI-80, Rev. 15	"Administrative Procedure for Preventive Maintenance of Nondestructive Examination Equipment"

With regard to the above the inspector noted the following:

- The licensee was in the process of reviewing the B&W QA program; therefore, at the time of this inspection, the program had not been approved. (It should be noted that to date, B&W has accomplished no work.)
- At the time of this inspection, documented evidence of licensee approval of the Westinghouse (W) QA Program was not available to the inspector (work has been accomplished by Westinghouse).

This matter is identified as inspector followup item 261/84-33-01, and is discussed further in paragraph 5b(1).

- (2) The inspector reviewed the below listed documents to determine whether the scope of the preservice inspection included: descriptions of areas to be examined; examination category; method of inspection; extent of examination; and justification for exceptions.

Documents

"Examination Program Plan" (Draft)
 "Second Ten Year Inservice Inspection Program Plan"

- (3) The inspector reviewed the below listed documents to determine whether the personnel qualification program for PSI/ISI is consistent with applicable regulatory requirements.

Document Identification

Title

W - PA 10.3, Rev. 0

"Qualification and Certification of Visual Examination Personnel For Inservice Inspection"

W - PA 10.1, Rev. 7

"Training Qualification and Certification of Personnel in Nondestructive Examination (NDE)"

B&W - ISI-24, Rev. 5

"Personnel Qualification Eddy Current Examination"

- (4) The inspector reviewed the below listed documents to determine whether the PSI/ISI program and referenced documents contain adequate provisions relative to the control of NDE records in the following areas: examination results; NDE equipment - listing; calibration data sheets; calibration blocks - listing; personnel qualification; and drawings, sketches, and work orders.

The inspector reviewed the documents to verify that responsibilities have been assigned for maintenance of required NDE records and that controls have been established to accomplish the following: define record storage facility; designate a custodian; describe the filing system; establish a method for verification that records and materials reviewed for storage are in agreement with transmittal documentation; provision governing access to files; and establishment of filing supplemental information.

Document Identification

Title

CP&L - RMP-001, Rev. 2

"Plant Records and QA Record Storage"

CP&L - PLP-003, Rev. 2	"Records Management Systems"
CP&L - PLP-004, Rev. 0	"Document Control Program"
<u>W</u> - OPS-NSD-101, Rev. 5	"Preservice and Inservice Inspection Documentation"
B&W - ISI-2, Rev. 5	"Administrative Procedure for Records Management"
CP&L - RMS-1, Rev. 5	"HBR Plant Filing Index and Instructions Records Management System (RMS)"

- (5) The inspector reviewed the below listed documents to determine whether the licensee ISI program had been categorized with inspection intervals and periods consistent with applicable regulatory requirements.

Documents

"Examination Program Plan" (Draft)

"Second Ten Year Inservice Inspection Program Plan"

(b) Procedure Review (73052B)

- (1) The following procedures were reviewed in the areas of procedure approval, requirements for qualification of NDE personnel, and procedure scope:

<u>Procedure Nos.</u>	<u>Title</u>
B&W - ISI-425, Rev. 7	"Eddy Current Examination of Tubing by the Absolute Multicoil (8x1) Technique"
B&W - ISI-437, Rev. 0	"Multifrequency Eddy Current Exam. of .875-in. OD x .050-in. Wall RSG Tubing in Westinghouse Series 44 and 44F RSGs"
B&W - ISI-460, Rev. 7	"Technical Procedure for the Evaluation of Eddy Current Data of Nuclear Grade Steam Generator Tubing"

B&W - ISI-463, Rev. 2

"Technical Procedure for the
Evaluation of Eddy Current
Data Generated from the
Multi Element Probe"

With regard to the above, the inspector noted that the licensee had not yet approved the B&W QA program including procedures B&W ISI-425 to 463.

The inspector stated that pending NRC review of documented evidence of approval of the B&W and W QA programs, as discussed in paragraphs 5(a)(1) and 5 b(1), this matter will be identified as inspector followup item 261/84-33-01: "ISI QA Program Approval."

- (2) Procedure Nos. ISI 425, 437, 460 and 463 were reviewed for technical adequacy with ASME Section V and other commitments/requirements in the following areas: a two-channel examination unit is specified; two channel examination indication equipment is specified; a criterion has been established for maximum sensitivity; a criterion has been established for determining material permeability; the method of examination is described; methods of calibration and calibration sequence is described; calibration simulator is described and; acceptance criteria is specified and corresponds with ASME Code Section V.
- (3) The following documents were reviewed for completion of required records:

<u>Procedure ID</u>	<u>Title</u>
<u>W</u> - ISI-8, Rev. 8	"Visual Examination"
<u>W</u> - ISI-11, Rev. 10	"Liquid Penetrant Examination"
<u>W</u> - ISI-10, Rev. 6	"Qualification of Ultrasonic Manual Equipment"
<u>W</u> - ISI-47, Rev. 3	"Manual Ultrasonic Examiner Action of Welds in Vessels"
<u>W</u> - ISI-206, Rev. 0	"Manual Ultrasonic Examination of Welds"
<u>W</u> - ISI-70, Rev. 2	"Magnetic Particle Examination"
<u>W</u> - OPS-NSD-101, Rev. 5	"Preservice and Inservice Inspection Documentation"
B&W - ISI-425, Rev. 7	"Eddy Current Examination of Tubing by the Absolute Multicoil (8x1) Technique"

B&W - ISI-437, Rev. 0	"Multifrequency Eddy Current Exam. of .875-in. OD x .050-in. Wall RSG Tubing in Westinghouse Series 44 and 44F RSGs"
B&W - ISI-460, Rev. 7	"Technical Procedure for the Evaluation of Eddy Current Data of Nuclear Grade Steam Generator Tubing"
B&W - ISI-463,	"Technical Procedure for the Evaluation of Eddy Current Data Generated from the Multi-Element Probe"

Within the areas examined no violations or deviations were identified.

6. Inspector Followup Items

- a. (Closed) Item 261/84-27-04: "W Personnel Qualification Program"

The licensee made the W Personnel Qualification Program available to the inspector. The inspector had no further questions in this area. This matter is considered closed.

- b. (Closed) Item 261/84-27-06: "UT System Check"

The inspector determined that the requirements for UT system check as specified in W - ISI-47 and W - ISI-206 are consistent with the intent of the ASME code. This matter is considered closed.