

CP&L
Carolina Power & Light Company

Central File

July 12, 1979

79 JUL 17 A 9: 37

Serial: GD-79-1766

File: NG-3513(R)

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
LICENSE NO. DPR-23
DOCKET NO. 50-261
SUPPLEMENT II TO RESPONSE TO IE BULLETIN 79-06A

Dear Mr. O'Reilly:

As a result of further review and based on a telephone conversation with the Office of Nuclear Reactor Regulation Staff on July 5, 1979, we are supplementing further our responses of April 24, 1979, and June 28, 1979 to IE Bulletin 79-06A. The attached information, in some cases, clarifies previously provided information, or updates our intentions and commitments for reviews or procedure changes.

I trust this information is suitable for your use.

Yours very truly,

M. A. M. Utley
for E. E. Utley
Executive Vice President
Power Supply and Customer Services

EEU/t1
Attachment
cc: Mr. V. Stello

add
ccp

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RESPONSE TO ITEMS 8 AND 10 - ADDITIONAL INFORMATION

1. The review of Operating Procedures and Valve Lineups will be completed prior to startup.
2. Reviews of periodic test procedures will be completed prior to their use.
3. Methods of Shift Turnover - All turnovers are completed in the job area. These turnovers consist of several methods of transferring information, such as:
 - a. Verbal.
 - b. Logs.
 - c. Partially completed procedures.
 - d. Written notes.
 - e. Shift checkoff procedures.

The verbal method is the most widely used for general plant status. It includes, where appropriate, a walkthru of portions of the controls or equipment to graphically display the existing conditions. Each oncoming shift member reviews the previous shift's logs, since his last watch, to note various changes and occurrences in the plant status. Procedures requiring continuation into another shift are given to assigned individuals in the oncoming shift with an explanation of the status of the procedure. Written notes of short term nature are passed on to oncoming shifts to insure nonroutine tasks are completed. These are informal notes and are not considered as procedures. They are only "Flags" for various nonroutine operational jobs.

Shift checkoff procedures are formal approved procedures used at the beginning of each shift to verify the status of LCO equipment. In general, these procedures are used by shift personnel to verify the following:

- a. Limiting conditions for operations are met.
- b. Equipment out of service is noted and time limits met.
- c. Shift checks of instrumentation and equipment are completed.
- d. Various plant parameters are within normal operating range.

1. The H₂ vent listed in our June 28, 1979 response refers to the post accident H₂ ventilation system. This system is normally aligned with all valves closed. Power to the valves (Nitrogen) is isolated and power to the controls (electrical) is locked out by key control switches. These keys are controlled by normal administrative procedures. The valves are not opened during normal operation. They are functionally tested during each refueling. The valves in this system are used during post LOCA conditions to manually vent H₂ from the containment to lower H₂ concentrations. The system is not required until weeks after a LOCA as described in the FSAR. The valves are only opened under the above listed conditions, therefore, they require neither containment isolation nor high radiation interlocks. If the valves are opened and a containment isolation is indicated, they do not shut automatically. At any time when the valves are open the operator can manually shut the valves using control switches and if there is a loss of power to the valve they will fail closed. There are double isolation valves on each H₂ vent line in case of a single failure of one valve.

2. For the valves in the systems listed, the following occurs when containment isolation is reset:

Containment Purge:	Remain closed if high radiation signal is present. Will remain closed in the absence of all isolation signals until operator action opens the valves.
Hydrogen Vent:	See discussion above.
Waste Gas:	Valves remain closed until action is taken by the operator to open them.
CV Sump Pump Discharge: (Dirty Radwaste)	Valves remain closed until operator action is taken to open them.
RCDT Pump Discharge: (Clean Radwaste)	Valves remain closed until operator action is taken to open them.
Steam Generator Blowdown:	Blowdown valves remain shut if a high radiation signal is present. Valves will reopen automatically if both the high radiation and containment isolation signals are removed and the main feedwater pumps are running. They will remain closed if these conditions are not met.

3. In addition to valves listed above, the primary sample system valves, the blowdown valves, the blowdown sample valves, and the gas analyzer valves from the PRT and RCDT receive containment isolation signals. After containment isolation is reset, these valves remain closed until operator action is taken to open the valves, with the exception of the gas analyzer valves from the PRT and RCDT. If left in automatic, these valves will automatically open during the automatic sequence sampling performed by the gas analyzer, if containment isolation is reset. To preclude their opening, Emergency Instructions will be revised, prior to startup, to have the operator remove the gas analyzer sampling of the PRT and RCDT from the automatic sampling cycle under loss of coolant conditions. This can be done with two existing bypass switches and will prevent an automatic signal from opening the valves after containment isolation is reset.

In summary, our reviews have indicated that the automatic sampling of the PRT and RCDT gas space is the only automatic function which after resetting containment isolation could result in an undesirable release of potentially radioactive fluid from the containment. Valves in other potentially radioactive lines have radiation interlocks or require a manual operation to reopen. By bypassing the sample lines, the operator will preclude the opening of the sampling valves from the PRT and RCDT and any potential release. CP&L, however, considers manual bypassing of the sample lines as outlined in the revised Emergency Instructions as an interim solution only. Modifications to preclude the automatic sampling of the PRT and RCDT upon resetting of containment isolation unless manual action is taken are under consideration and will be installed during the next refueling outage.