



Carolina Power & Light Company

*Central File*  
*50-261*

August 28, 1979

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

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

Dear Mr. O'Reilly:

Carolina Power & Light Company (CP&L) originally responded to IE Bulletin 79-06A on April 23, 1979. Our response was supplemented on June 28, 1979, and July 12, 1979. As a result of additional issues raised in an NRC letter dated August 9, 1979, from Mr. A. Schwencer of the Office of Nuclear Reactor Regulation, CP&L herewith provides information to supplement our previous responses. The supplemental response is attached. Item numbers on the response correspond to item numbers in IE Bulletin 79-06.

CP&L has chosen to address Mr. Schwencer's concerns through your office in order to maintain consistency on the docket and because this was the channel used for previous responses to questions on IE Bulletin 79-06A.

I trust this information is suitable for your use.

Yours very truly,

B. J. Furr  
Manager, Generation Department

JJS/jcb

cc: Messrs. V. Stello (NRC)  
A. Schwencer (NRC)

CAROLINA POWER & LIGHT COMPANY

H. B. ROBINSON UNIT NO. 2

DOCKET NO. 50-264

SUPPLEMENTAL RESPONSE TO IE BULLETIN 79-06A

SUPPLEMENT III

AUGUST 27, 1979

## Response to Item 8

- a. All safety-related valve positions were verified to be in the proper position by performing valve lineups utilizing system walk-throughs. The valve lineups were completed prior to reactor startup from cold shutdown (July 16, 1979). All safety-related valve positions were documented at that time in accordance with plant procedures.
- b. All procedures were reviewed to assure that safety-related valves are positioned correctly. The review was completed prior to reactor startup from cold shutdown, in accordance with our commitment of July 12, 1979.
- c. As indicated above, all safety-related valve positions were verified correct prior to startup. The plant was returning to power operations following a refueling outage. During that outage, many safety systems were taken out of service or aligned differently from their normal lineup. Therefore, many valves were not in their normal (for power operations) position. By use of the valve lineups, all safety-related valves were placed in their proper position for returning to power. A discussion of the number of valves out of their normal position is inappropriate due to the number of systems not in their normal lineup. No valves were found in incorrect positions for the system lineup at the time of the inspection.
- d. As indicated above, a review of all procedures was conducted. The object of the review was to determine if any of our procedures could inadvertently inhibit the proper operation of an engineered safety feature of the plant. Not only were procedures directly affecting these systems reviewed, but procedures controlling safety related support systems were also reviewed. The methodology of the review centered first on the selection of the systems affected by the review. These were determined by reviewing the Final Safety Analysis Report, then systems providing support to the Engineered Safety Features were added to the list.

A general review of the Plant Operating Manual contents eliminated those procedures totally unrelated to those systems under review.

Next a list of procedures and instructions requiring indepth review was developed. These procedures and instructions were then reviewed by a team of four individuals with valid Senior Reactor Operator Licenses. In the course of the review, the individuals used system walkthrough, as built drawings and system descriptions, supplemented by their extensive operational experience to verify the accuracy of the procedures and instructions reviewed.

The review resulted in several changes to the procedures and instructions. Most of the changes were not safety-related. The majority of the changes were to correct minor charges that have evolved in operating conditions over previous years. The procedures which required changes involving safety-related concerns are listed below. None of the other procedures reviewed required any such changes.

### 1) Safety Injection System Component Tests (CP&L PT-2.7A, B and C)

The change required on this periodic test was to add a specific sign off block to document the verification that the system has been restored to pretest conditions. Although individual steps in the procedures require the recording of the individual components post test position, no specific step existed for verification that the components be verified as in their pre-test position.

2) Service Water System Component Tests (CP&L PT-4.1, B and C)

The change required on this periodic test was to change the requirement for post-test system restoration to require that the system be restored to pretest conditions. Individual steps require post-test positions be recorded, however, system restoration required that the system be restored to pretest or desired conditions. As stated the change was made to delete "or desired".

- e. Valve alignment discrepancies identified in IE Inspection Report 50-261/79-11 were discussed in our August 8, 1979, letter to you. For convenience, a copy is attached.
- f. All safety-related valve positions are inspected periodically. As noted above, all safety-related valve positions are verified prior to the plant returning to power following a cold shutdown. Operational work permits, periodic tests and operating procedures insure that valves are returned to their correct positions following manipulation due to maintenance, testing or plant startup. In addition, the functional operability of these systems is confirmed by periodic tests as specified in Section XI of the ASME Code and the unit Technical Specifications. By ensuring functional operability, a correct valve position for these systems is verified.
- g. A locked valve refers to the physical locking of the valve operator to prevent inadvertent operation of the valve. Locked valves are controlled by the use of two levels of procedural controls.

The first level is through the use of system line-ups. Valves requiring locking are listed in the line-ups as locked in the required position. For safety-related valves, locked valves are only operated under approved procedures. During performance of these procedures; prerequisites, initial conditions, and precautions preclude operation of a locked valve which could lead to a condition of operation with less than the minimum equipment or flow paths available as specified by Technical Specifications.

The second level of control of locked valves is through the use of key controls. Keys are required for the operation of certain switches, valves, and switchgear. The components requiring key control are those with special operational importance or safety significance. A list is maintained in the Control Room that indicates each key-controlled item and the respective key identifications. All keys on this list are identified as Controlled Keys. These keys are maintained in a locked cabinet under the control of the Shift Foreman, who maintains possession of the cabinet key. Permission of the Shift Foreman is required for the use of a Controlled Key.

Before authorizing the use of a Controlled Key, the Shift Foreman must assure himself that the individual intending to use the equipment understands and appreciates the particular operational or safety requirements associated with the equipment. The Shift Foreman or his designee shall open the lock. At the completion of the operation or task, he will assure himself that conditions are proper for placing the lock control in the proper position and returning the key to the Key Control Cabinet. The individual using the equipment under key control is responsible for insuring that unauthorized personnel do not use equipment during the period when the controlled device is unlocked.

- h. As noted in IE Inspection Report 79-11, occasionally valve tags are missing on some valves. It is CP&L's policy to install and maintain tags on all valves at H. B. Robinson as an operator aid. When or if a tag is discovered missing,

it is replaced. It should be noted, however, that valve tags are only one method utilized to identify valves. Valves are neither operated nor verified in a certain position when performing valve lineups until the valve is positively identified by one or a combination of the following methods:

1. Field identification tags containing valve number and functional description of the valve.
2. Functional description of the valve as listed on the valve lineup.
3. As-built drawings and flow designs.
4. System and line walkthroughs.

The methods are supplemented, but not substituted for, by the operator's detailed knowledge of the system. Only qualified operators and auxiliary operators or an operator under the direct supervision of a qualified person are allowed to complete valve lineups.

- i. As indicated in item b above, all procedures including valve check lists, have been reviewed and reflect the correct position for a safety-related valve. As indicated in d above, this review included checking the procedures against as-built drawings.

#### Response to Item 10

- a. As stated in our June 28, 1979, response, the operability of redundant pieces of equipment in safety-related equipment is verified prior to removal of any safety-related component from service consistent with the minimum equipment lists as developed from the Limiting Conditions for Operation listed in the unit Technical Specifications. Operability is verified by test or by visual inspection. The visual inspection consists of, as a minimum, a review of the equipment status on the control board. Applicable tests or inspections are specified in the individual Operating Work Permit and/or the applicable equipment trouble and work report.
- b. The resolution of equipment restoration discrepancies identified in IE Inspection Report 79-11 and corrective action taken to prevent recurrence are discussed in our August 8, 1979, letter to you, which is attached.
- c. All documents related to Item 10 of the Bulletin have been reviewed and appropriate changes made. Item 8 d above discusses this review.

#### Response to Item 13

Our April 23, 1979 response indicated that any Technical Specification Change required as a result of reviews or actions required by the Bulletin would be submitted by the end of the refueling outage. Appropriately, due to a design change to eliminate pressurizer level as an input for initiating Safety Injection (as required in the Bulletin) a request for license amendment was submitted May 18, 1979, and was issued on May 24, 1979. The license amendment and design change were incorporated prior to startup.

Our July 12, 1979, response documented a design change to the containment isolation valves from the PRT and RCDT to the gas analyzer. The design change will be completed during the next refueling outage. If a license amendment is required it will be submitted at least 90 days prior to startup.