



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

SEP 22 1978

Central File
EP-26

In Reply Refer To:
RII:TJM
50-261/78-16

Carolina Power and Light Company
ATTN: Mr. J. A. Jones
Executive Vice President
Engineering, Construction
and Operation
336 Fayetteville Street
Raleigh, North Carolina 27602

Gentlemen:

Thank you for your letter of September 8, 1978, informing us of steps you have taken to correct the items of noncompliance concerning activities under NRC Operating License No. DPR-23 brought to your attention in our letter of August 14, 1978. We will examine your corrective actions and plans during subsequent inspections.

We appreciate your cooperation with us.

Sincerely,

F. J. Long
Branch Chief

cc: Mr. R. B. Starkey
Plant Manager
P.O. Box 790
Hartsville, South Carolina 29550

CCP



Carolina Power & Light Company

September 8, 1978

File: NG-3513 (R)

Serial: GD-78-2422

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
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/78-16

Dear Mr. O'Reilly:

We have received and reviewed the subject report and are hereby responding to the item of noncompliance:

ENFORCEMENT ITEM

A. Deficiency

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of U. S. NRC Regulatory Guide 1.33 dated November 3, 1972.

Contrary to the above Technical Specification, the following activities were not implemented as required by Administrative Instructions, Volume 1, Sections 4.1.6 and 4.1.4.

- a. Quarterly procedure reviews were not documented for several shift and supervisory personnel for the second quarter, April - June, 1978.
- b. Weekly facility inspections by plant management had not been documented for several weeks during the period of January - June, 1978.

DISCUSSION

Upon completion of a detailed review of the findings of this citation, it was determined that in all cases the required reviews and inspections had been conducted. The problem was one strictly of documentation of the required activity. The following is an explanation of corrective action to prevent further documentation problems.

CORRECTIVE ACTION

- A. The quarterly procedure reviews which were not documented for several shift and supervisory personnel for the second quarter of 1978 were submitted following the NRC Inspection.
- B. Documentation for four weekly facility inspections by plant management for the period of January - June, 1978 were not available for review by the NRC Inspector. Following completion of the NRC Inspection, two reports that had been misfiled were located. Documentation of a third weekly inspection was provided by means of the Security System entrance and exit computer printout. A report stating such has been filed with the other weekly inspection reports. The fourth weekly inspection could not be verified because the security computer was not operational at the time of the inspection. Therefore, documentation is now available for three of the four weekly facility inspections.

CORRECTIVE ACTION TO PREVENT FURTHER NONCOMPLIANCE

- A. The personnel involved have been instructed by the Plant Manager that timely submittal of quarterly procedure review documentation is their responsibility and is a requirement of the plant Administrative Instructions.
- B. To prevent confusion in filing weekly facility inspection reports, the format of the report has been changed to better define where the reports are to be retained. In addition, a tickler system has been implemented to ensure submittal of the reports each week.

Mr. James P. O'Reilly

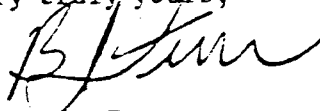
-3-

September 8, 1978

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on August 4, 1978.

Very truly yours,



B. J. Furr
Manager
Generation Department

HSZ/DCS:gld*



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REGION II
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ATLANTA, GEORGIA 30303

AUG 14 1978

In Reply Refer To:
RII:TJM
50-261/78-16

Carolina Power and Light Company
ATTN: Mr. J. A. Jones
Executive Vice President
Engineering, Construction
and Operation
336 Fayetteville Street
Raleigh, North Carolina 27602

Gentlemen:

This refers to the inspection conducted by Mr. T. J. McHenry of this office on July 10-13, 1978, of activities authorized by NRC License No. DPR-23 for the H. B. Robinson 2 facility, and to the discussion of our findings held with Mr. R. B. Starkey at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

One new unresolved item resulted from this inspection and is discussed in the enclosed report. This item will be examined during subsequent inspections.

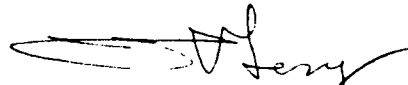
During the inspection, it was found that certain activities under your license appear to be in noncompliance with NRC requirements. This item and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 20 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

AUG 14 1978

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,



F. J. Long, Chief
Reactor Operations and
Nuclear Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. Inspection Report No. 50-261/78-16

cc w/encl:

Mr. R. B. Starkey, Plant Manager
P. O. Box 790
Hartsville, South Carolina 29550

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company

License No. DPR-23

Based on the results of the NRC inspection conducted on July 10-13, 1978, it appears that certain of your activities were not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in our correspondence to you dated December 31, 1974.

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of U.S. NRC Regulatory Guide 1.33 dated November 3, 1972.

Contrary to the above Technical Specification, the following activities were not implemented as required by Administrative Instructions, Volume I, Sections 4.1.6 and 4.1.4.

- a. Quarterly procedure reviews were not documented for several shift and supervisory personnel for the second quarter, April-June, 1978.
- b. Weekly facility inspections by plant management had not been documented for several weeks during the period of January-June, 1978.

This is a deficiency.



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Report No.: 50-261/78-16

Docket No.: 50-261

License No.: DPR-23

Licensee: Carolina Power and Light Company
366 Fayetteville Street
Raleigh, North Carolina 27602

Facility Name: H. B. Robinson 2

Inspection at: H. B. Robinson Site, Hartsville, S. C.

Inspection conducted: July 10-13, 1978

Inspectors: T. J. McHenry
D. R. Quick

Reviewed by:

H. C. Dance
H. C. Dance, Chief
Reactor Projects Section No. 1
Reactor Operations and Nuclear Support Branch

8/11/78
Date

Inspection Summary

Inspection on July 10-13, 1978: (Report No. 50-261/78-16)

Areas Inspected: Routine, unannounced inspection of plant operations, IE Bulletin and Circular followup, licensee event followup, limiting conditions for operation, and independent inspection effort. The inspection involved 56 inspector-hours on site by two inspectors.

Results: Of the five areas inspected no items of noncompliance or deviations were found in four areas. One item of noncompliance was identified in one area (Deficiency: Failure to document procedure reviews and plant inspections as required by administrative procedures (78-16-01)).

DETAILS I

Prepared by:

Thomas J. McHenry

T. J. McHenry, Reactor Inspector
Reactor Projects Section No. 1
Reactor Operations and Nuclear Support
Branch

8-11-78
Date

Donald R. Quick

D. R. Quick, Reactor Inspector
Reactor Projects Section No. 1
Reactor Operations and Nuclear Support
Branch

8/11/78
Date

Dates of Inspection: July 10-13, 1978

Reviewed by:

H. C. Dance

H. C. Dance, Chief
Reactor Projects Section No. 1
Reactor Operations and Nuclear Support
Branch

8/11/78
Date

1. Persons Contacted

- *R. B. Starkey, Jr., Plant Manager
- R. E. Morgan, Operations Supervisor
- C. W. Crawford, Maintenance Supervisor
- *H. S. Zimmerman, Engineering Supervisor
- *R. H. Chambers, Senior Engineer
- *M. L. Layton, Senior Nuclear General Specialist
- R. S. McGirt, Senior Nuclear General Specialist
- M. Page, Engineer
- C. L. Wright, Engineering Technician
- *B. W. Garrison, Quality Assurance Supervisor

Several Control Room, Shift Foreman and Plant Operators.

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

No previous items of noncompliance or deviations were reviewed during this inspection.

3. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. One unresolved item (78-16-02) relating to Technical Specification thirty-day reporting requirement is discussed in paragraph 5 of this report.

4. Exit Interview

A meeting was held on July 13, 1978, with Mr. R. B. Starkey, Jr., Plant Manager, and his staff members denoted in paragraph 1. Items covered by the inspection were discussed, including a new noncompliance item discussed in paragraphs 11 and 12, and an unresolved item discussed in paragraph 5.

5. Safety System Settings and Limiting Conditions For Operation

The inspector reviewed licensee records and activities to verify that the following Technical Specification (TS) requirements were met.

- a. TS 3.1.5 concerning reactor coolant system leakage for period of April 1, 1978 through July 7, 1978.
- b. TS 3.3.2.1 concerning containment cooling and iodine removal system operability during power operation for period of May 1, 1978 through July 7, 1978.
- c. TS 3.4.1 concerning emergency secondary cooling systems operability for period of May 1, 1978 through July 7, 1978.
- d. TS 3.7.1 concerning emergency bus and diesel generator operability during power operation for period of April 1, 1978 through July 7, 1978.
- e. TS 3.1.4 concerning fire protection systems operability for period of April 1, 1978 through July 7, 1978.

During inspection of the above areas the inspector noted that two limiting conditions for operation (LCO) had existed on July 26-27, 1978 due to maintenance on motor driven auxiliary feedwater system valves. Further investigation indicated that the licensee did not intend to provide a thirty-day written report on these events. Technical Specification 6.9.2.b.(2) specifies in part that conditions leading to operation in a degraded mode permitted by a limiting

condition for operation require a thirty-day written report except where such condition is a result of routine surveillance, instrument calibration or preventive maintenance. The licensee stated that in the past thirty-day written reports had not been submitted when a LCO resulted due to maintenance, provided the system or component was considered operable prior to removal from operation since the general purpose of the maintenance was considered preventive, even though the actual maintenance performed was corrective maintenance.

The requirement for thirty-day written reports for LCO's created by corrective maintenance is considered unresolved until further guidance is provided to the licensee from the NRC. (78-16-02).

6. Review of Licensee Event Reports (LER's)

The inspector reviewed selected LER's for consistency with the requirements of the Technical Specifications. The inspector examined the licensee's analysis of the event, the corrective action taken, and discussed the LER's with licensee representatives. The following LER's were reviewed:

a. LER-78-12, Boron Injection Tank Dilution

The inspector discussed the LER with the engineer that conducted the investigation of this occurrence. Discussion with the licensee representative confirmed the designation of the cause and corrective action taken. Further discussion revealed that a thirty-day report on a subsequent identical occurrence was pending. The inspector stated that the corrective action of the pending LER should address correction of the primary cause of the occurrence as a first priority and the correction of the result of the occurrence as a second priority. This LER is closed.

b. LER 78-13, Blown Fuse To Service Water Valve Actuator

The inspector confirmed that blown fuse was the correct size and type required by design. This LER is closed.

c. LER 78-14, Loss of Capability for Auxiliary Feedwater to S/G A

The inspector confirmed by log entries of events occurring as described in this LER. This LER is closed.

7. Review of IE Circulars and Bulletins

The inspector reviewed applicable IE Circulars with licensee personnel to ascertain that they had been received on site and reviewed by cognizant personnel. Licensee's actions on the following IE Circulars were reviewed:

<u>Circular No.</u>	<u>Subject</u>
78-02	Proper Lubricating Oil for Terry Turbines
78-04	Improper Fire Door Fusible Link Installation

The inspector confirmed that the above IE Circulars were received and reviewed by cognizant personnel. The inspector has no further questions on IE Circulars 78-02 and 78-04.

The inspector reviewed IE Bulletin 78-05 concerning malfunction of General Electric Model CF105X auxiliary contacts. The inspector has no further questions on this Bulletin, since discussion with cognizant licensee personnel indicated that the licensee's actions and reply to this Bulletin were satisfactory.

8. Inspector Comments Concerning The Turbine Driven Auxiliary Feedwater Pump

A review of Equipment Inoperable Report forms indicated that the turbine driven auxiliary feedwater pump (TDAFP) had been declared inoperable for the past 31 days. Both motor driven auxiliary feedwater pumps were operable as required by the Technical Specifications. A further review of maintenance requests and tagging orders indicated that several attempts to repair a leaking pump discharge valve had been performed unsuccessfully. The inspector determined that while the TDAFP could be placed in operation for an emergency condition, no such administrative guidance existed. The inspector discussed this item with plant management and suggested that the licensee provide temporary administrative guidance and procedure changes as necessary to establish a policy and method for placing the TDAFP in service under potential or actual emergency conditions. The Plant Manager acknowledged the inspectors comments and indicated that implementation of the recommended action would be considered. (78-16-03)

9. Plant Tour

The inspector toured the turbine generator area, auxiliary building, and control room. The control room panels were reviewed for hot shutdown conditions. During the tour of the control room discussions were held with several control operators pertaining to illuminated annunciators, plant conditions, administrative practices, and the reactor trip which occurred on July 10, 1978. In the turbine-generator area particular attention was paid to the turbine stop valve maintenance in progress. No problems were identified.

10. Review of Logs and Operating Records

The inspector reviewed the following operating logs and records to ascertain whether operation was in conformance with Technical Specifications and established requirements.

- a. Shift Foremans Log June 30 - July 12, 1978
- b. Control Room Operators Log June 1 - July 12, 1978
- c. Jumper and Lifted Wire Log - January 1 - July 12, 1978
- d. Standing Orders and Operating Notes - January 1 - July 12, 1978
- e. Nuclear Plant Equipment Trouble and Work Reports - March 1 - July 12, 1978
- f. Control Room Data Log Sheets June 2 July 1, 1978
- g. Auxiliary Equipment Data Log Sheets June 2 - July 1, 1978

As a result of the review of the control room data log sheets and the nuclear plant equipment trouble and work reports, it was concluded that unreliable data had been recorded on permanent records for safety related cold leg injection accumulator "A" for part of the month of June. Level instrument LI-920 for accumulator "A" was acting erratically and two trouble tickets were initiated by the shift foremen on June 7, 1978. The control operators continued to log the faulty indication until June 24, 1978 at which time they started logging the backup level channel (LI-922). This was brought to the attention of plant management and it was suggested that formal guidance be provided to the operators to prevent recurrence of this problem in similar situations. The licensee acknowledged the inspectors comments and indicated that corrective action would be considered. This item will be reviewed on a future inspection. (78-16-04)

11. Operator Retraining and Replacement Training Program

The inspector reviewed retraining records pertinent to training of licensed personnel on shift to verify conformance with 10 CFR 55, Appendix A and plant administrative instructions.

During this inspection the inspector noted that documentation was not available in the training supervisor's file to support the requirement that licensed personnel had reviewed applicable portions of the plant operating manual. This documentation was not available for the second quarter of 1978 (April through June) for shifts 1, 2, 4 and 6, the maintenance supervisor and operations supervisor. 10 CFR 55, Appendix A requires, in part, periodic reviews of procedures by operating shift personnel. The Plant Operating Manual Volume I, Administrative Instructions, Section 4.1.6 requires quarterly review of procedures by operating shift personnel and further requires the shift foreman to verify completion of this training by submitting documentation to the training supervisor prior to the end of the quarter. It was verified with available personnel involved that training had been conducted during the quarter but the documentation had not been submitted.

This failure to document training has been identified as a deficiency in the Notice of Violation. (78-16-01)

12. Management Staff Plant Tours

The inspector reviewed the policy and records pertaining to plant operations assessment by management personnel on weekends and backshifts. Volume 1, Administrative Instruction, Paragraph 4.1.4, of the Plant Operating Manual requires the plant manager or one of his six management level supervisors to conduct a tour of the plant on a weekend or backshift during his scheduled week-long tour as the supervisor on call. The records of these inspections were examined for the period of January 1978 through June 1978. There was no documentation in the file to support the fact that inspection tours had been made during the following periods:

February 11-17, 1978
March 4-10, 1978
March 25-31, 1978
June 17-23, 1978

Several supervisors were interviewed to ascertain that the above listed inspection tours were conducted even though they had not been documented.

This lack of documentation has been identified as a deficiency in the Notice of Violation. (78-16-01)