



Carolina Power & Light Company

March 14, 1979

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FILE: NG-3513 (R)

SERIAL: GD-79-661

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. 50-261/79-03

Dear Mr. O'Reilly:

We have received and reviewed the subject report and are hereby responding to the infraction as requested.

Enforcement Item

Infraction

As required by 10 CFR 50.59(b), a written evaluation must be maintained which provides the basis for the determination that a change in the facility as described in the safety analysis report does not involve an unreviewed safety question.

Contrary to the above, the safety evaluation for PT-3.0, Containment Spray Nozzle Five-Year Test, did not provide a written basis that the permanent removal of two blind flanges on the spray system piping did not involve an unreviewed safety question. The blind flanges are described in the Final Safety Analysis Report by figures 5.2.2-6 and 6.2-1, and had been permanently removed during the performance of PT-3.0 in November, 1975.

Corrective Action

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A review of the reported violation revealed an unintentional permanent removal of the blind flanges referenced. It was not the intent of PT-3.0, Containment Spray Nozzle Five-Year Test, to make a permanent design change as described. The procedure, performed only during Cold Shutdown conditions, should have included a step to reinstall the flanges upon completion of the test. Therefore, the procedure was inadequate, resulting in the inadvertent permanent removal of the flange.

The procedure is currently being revised to include a step to reinstall the blank flanges. This procedure will not be used until the changes are made.

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In addition to the changes to the periodic test, the valve lineup in the operating procedure (CPL-OP-42) is being revised to require that the blind flanges be installed for normal operation.

The blind flanges were reinstalled on March 9, 1979.

Corrective Action To Prevent Further Non-Compliance

The procedure revisions above, when implemented, should insure adequate controls for the removal and reinstallation of the blind flanges, correcting the procedural deficiency. Since the procedure was not intended to permanently change the system and since the initial conditions required that the plant be at Cold Shutdown during performance, no further corrective action regarding the requirements of 10 CFR 50.59(b) is believed warranted.

Date When Full Compliance Will Be Achieved

The blind flanges were reinstalled on March 9, 1979. The procedure revisions addressed above will be implemented by March 31, 1979.

Yours very truly,



B. J. Furr
Manager
Generation Department

DCS:JMC:jmb*