



Carolina Power & Light Company

August 3, 1979

FILE: NG-3513 (R)

SERIAL: GD-79-1970

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

12:56 PM 8/3/79

RECEIVED  
DATA

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
RESPONSE TO IE INSPECTION REPORT NO. 50-261/79-11

Dear Mr. O'Reilly:

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

Enforcement Item

Infraction

As required by Technical Specification 6.8.2, proposed changes to operating procedures shall be reviewed by the Plant Nuclear Safety Committee and approved by the Plant Manager.

Contrary to the above, during the period of May 21 - 25, 1979, the Emergency Diesel Generators and Auxiliary Feedwater Systems were not being operated in accordance with the requirements specified in operating procedures, in that:

1. Diesel generator day tank drain valves (FO-11A and B) are required to be closed by OP-7A valve check list. These valves were found open with tygon tubes attached for level indication.
2. Auxiliary feedwater pump discharge valves (AFW-45 and 46) are required to be open by OP-14A check list. These valves were found to be throttled.
3. The Load Limit and Synchronizer Indicator settings on both emergency diesel generator governors were found not set at values required by OP-7A check list.

Corrective Action

Upon notification of the items listed in the infraction, the Shift Foremen were notified of the violations. They were cautioned that all procedures should be changed using the procedures identified in the Administrative Instructions prior to implementation. Investi-

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gation was begun into the cause and corrective action was initiated for each of the items listed under the infraction.

Immediate investigation of the infraction identified that the diesel generator day tank drain valves were open as cited in Item 1. This was contrary to the requirement of the diesel generator fuel oil operating procedure valve check list (OP-7A). The valves were closed and the tygon tubing was removed.

Immediate investigation and follow-up of Item 2 revealed that the valves listed (AFW-45 and AFW-46) were throttled and the operating procedure valve check list OP-14A required the valves to be open. AFW-45 and AFW-46 are the manual discharge isolation valves from A and B motor driven auxiliary feedwater pumps. These valves are required to be throttled to prevent pump runout. The operating procedure valve check list did not reflect this requirement. The operating procedure valve check list (OP-14A) and General Operating Procedure (GP-2) were revised to require that both AFW-45 and AFW-46 be throttled to a position that will guarantee a flow of 300 gpm per pump.

Immediate follow-up of Item 3 verified that the load limit settings on both emergency diesel generators were set at a higher value than that required by OP-7A. The load limiter was set by the diesel generator vendor representative after completion of a routine service inspection. The setting was left at that position when the OP-7A check list was completed, contrary to the requirement of the procedure. The load limiter setpoint was discussed with the vendor, and the OP-7A setpoint was verified as correct. The load limiters were reset to the value of OP-7A. Although this was a violation of an approved procedure, it would not have posed a threat to the safety of the unit. The diesel generators would have responded as required and would have loaded as required in the event of an emergency condition in which they were required.

Follow-up investigation of the synchronizer indicator settings revealed that the indicators were set at the position required by the operating procedure. The discrepancy observed by the inspector was apparently due to his reading the wrong indicators. These synchronizer indicators have a knob with an indicator line on it plus a separate indicator under the knob. The two do not coincide. The indicator under the knob is used to verify the synchronizer indicator settings. The synchronizer indicator setting in OP-7A is a relative setpoint. Actual setting is dependent upon diesel performance when last operated. It is a relative indication of initial throttle position and the diesel automatically increases the controller as it is loaded. It is not required that the exact value be met for the diesel generator to load and function properly. Therefore, had this setpoint actually been different, as was thought by the inspector, there would have been no safety implications.

Corrective Action to Prevent Further Noncompliance

Further investigation of Item 1 identified that the valves and tygon tubing were used as local indication for day tank level during certain refueling testing. No level indication exists for the day tanks, only high and low limit switches. This local level indication was specifically required for the performance of periodic test CPL-PT-23.4, Diesel Fuel Oil System Flow Test. This test was initially performed during the 1979 refueling to verify diesel fuel oil flow. This periodic test did not include a direct step for reestablishing pretest valve positions, however, they should have been properly aligned during the valve lineup and all Shift Foremen have been notified of this deficiency. The procedure will be revised to include the requirement for reestablishment of pretest valve positions prior to the next time the procedure is performed. As further corrective action, the drain valve position noted in the lineup has been changed to "locked closed" to eliminate a potential fire hazard.

With respect to Item 2, the operating procedure has been revised to throttle the manual AFW discharge valves. In addition, the overall plant operating procedures GP-2 and GP-6 have been revised to verify the proper positioning of these valves to assure the design requirements as described in the FSAR for auxiliary feedwater are met when the AFW system is required to be operable. The General Plant Procedures have been revised to verify the proper flow from the motor-driven pumps are met and the pumps and drivers are protected from overload conditions. The operating procedure OP-14A for auxiliary feedwater has also been revised to reflect the actual throttled conditions.

With respect to the items cited in Item 3 of the infraction, the operating procedure was revised to reflect the proper pointer on the synchronizer indicator to be used in alignment on the diesel generator governor. The Shift Foremen were notified of this infraction to assist in the prevention of its recurrence.

The items listed do not reflect a generic concern with the manner in which procedures are followed at H. B. Robinson. The Administrative Instructions specifically state how procedures are changed. The processes outlined in those Instructions are followed by plant personnel, and the cases cited indicate isolated incidents and procedural deficiencies which have been corrected as was previously discussed. No further corrective action other than that discussed regarding this infraction is considered appropriate.

Enforcement ItemDeficiency

As required by Technical Specification 6.6.1, written procedures shall be written that meet the requirements of ANSI N18.7-1972, Section 5.3. ANSI N18.7-1972, Section 5.3.5(3) requires post maintenance return to service instructions which provide special attention for restoration of normal conditions.

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Contrary to the above, operating work procedures SIS-3, Safety Injection Pump C; and CS-7, Containment Spray Pump B, did not provide instructions to restore the associated equipment to an operable condition following maintenance.

Corrective Action

Investigation revealed that the two OWP's identified (SIS-3 and CS-2) did not require the associated pumps and valves to be properly aligned prior to returning the pump to an operable status. The OWP's were changed to insure proper system alignment after maintenance on the applicable pumps.

Corrective Action to Prevent Further Noncompliance

As follow-up and as response to IE Bulletin 79-06A, all OWP's have been reviewed and corrected as applicable to verify all equipment is properly aligned prior to returning the equipment to operable status following maintenance.

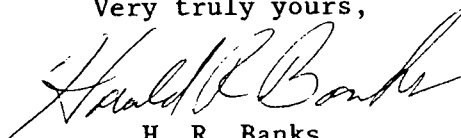
Date When Full Compliance Will Be Achieved With Respect to Both Items

With respect to the infraction, full compliance was achieved on July 3, 1979. Follow-up action to prevent further noncompliance has been initiated and completed with the exception of the revision of PT-23.4 as described which will be completed prior to its next use.

With respect to the deficiency, full compliance was achieved on May 24, 1979. A complete review of individual OWP's was completed with revisions made as required prior to its use during the period until all revisions resulting from the overall review of every OWP have been completed. This overall review was completed July 6, 1979. All revisions, as a result of these reviews will be implemented by August 15, 1979.

If further information is required, please notify me.

Very truly yours,



H. R. Banks

Manager

Nuclear Generation

MFP:CSB:dcj\*