



Carolina Power & Light Company

Company Correspondence

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USNRC REGION II
ATLANTA, GEORGIA

Robinson File No: 2-0-4-a-4

SERIAL: RSEP/80-76

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

H. B. Robinson Steam Electric Plant
Docket No. 50-261
License No. DPR-23
Response to IE Inspection Report No. 50-261/79-27

Dear Mr. O'Reilly:

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

Enforcement Item

Deficiency

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 cycle 7 low power physics testing, step 5.29 of Appendix D to procedure CPL-R-6.0 was changed without proper review and approval. An abbreviated method was used to measure the reactivity worth of control banks C and D in overlap.

Discussion

Step 5.29 of CPL-R-6.0 calls for a measurement of Control rod banks C and D reactivity worth in the normal overlap mode. The worth of the rod travel segment where banks C and D move simultaneously in overlap was measured and added to the worth of the lower portion of bank C and the upper portion of bank D as determined from earlier measurements. This method yielded results of equivalent accuracy to a single measurement performed over the span of banks C & D. Therefore, the intent of the procedure was met.

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Corrective Action

All personnel involved with the above measurement will be instructed as to the importance of verbatim compliance with approved procedures and the necessity to initiate procedural changes in accordance with Technical Specification 6.8 prior to any deviation from an approved procedure. In addition, step 5.29 of CPL-R-6.0 will be revised to allow the alternate procedure for measuring the reactivity worth of control banks C and D in overlap.

Corrective Action to Prevent Further Occurrence

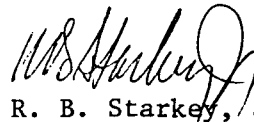
The above corrective action is sufficient to prevent further occurrence of the stated deficiency.

Date When Full Compliance Will Be Achieved

The corrective action regarding the instruction of personnel has been completed. The procedural change described will be implemented prior to cycle 8 startup physics testing.

Please contact our staff if further information is required.

Very truly yours,



R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

GLD/gm

cc: V. Stello (1)