



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

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

Serial:RSEP/80-1614

Mr. James P. O'Reilly
Director of Regulatory Operations
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
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. 50-261/80-21

Dear Mr. O'Reilly:

We have received and reviewed the subject report and are hereby responding to the stated items of noncompliance.

INFRACTION

As required by Technical Specification 6.5.1.7a, the PNSC must review changes to the facility as described in the safety analysis report to determine if the change constitutes an unreviewed safety question or change in Technical Specifications. FSAR Figure 11.1-2, Waste Disposal System, describes normal operation of the backup nitrogen regulator to the Chemical and Volume Control system vent header (PCV-1049) as automatic with regulator inlet isolation valve 1661 normally open. (Section A-5 of PLS-8, the Precautions, Limitations, and Setpoints for the Waste Disposal System stated that for proper operation of the waste gas system, PCV-1049 must operate to be open at 0.5 psig and shut at 0.8 psig.)

Contrary to the above, for approximately two years up to and including August 20, 1980, inlet isolation valve 1661 was normally closed precluding automatic operation of PCV-1049. A review to determine if the change constituted an unreviewed safety question was not performed.

CORRECTIVE ACTION

Valve 1661 had been shut to minimize the amount of waste gas generated. However, the operators involved did not consider this a facility change since no piping runs were modified or valves added to the system. They also did

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not recognize any inconsistency with the FSAR CVCS HUT System description because numerous valves shown on FSAR drawings are required to be placed in a position other than the FSAR drawing position during daily plant operations, i.e., FSAR system drawings show the systems in a configuration that may or may not correspond to a specific mode of operation. Therefore, it is often the case that a valve in a system is actually in a different position than that shown in FSAR. However, we do acknowledge that this change should have been covered in our operating procedures.

It should be noted further that the CVCS HUT Cover Gas System is normally cross connected between all three tanks. For this reason, assuming a complex loss of make up gas, a CVCS HUT would collapse only if all three tanks were full or nearly full and one was being processed. In situations in which only one tank was full and being processed and one (or both) of the remaining tanks was nearly empty, the cover gas would equalize between tanks at some lower pressure greater than 0 psig. In addition, the consequences of a CVCS HUT collapse is addressed and analyzed in the H. B. Robinson, Unit No. 2, FSAR. It is shown in Section 14.2.2 of the FSAR that the CVCS Holdup Tank vault volumes are sufficient to hold the full volume of a CVCS Holdup Tank without overflowing to areas outside the vault. Section 14.2.3 concludes that an accidental waste gas release from a CVCS Holdup Tank, assuming the plant is operating with 1% defective fuel, would present no hazard to the health and safety of the public. However, since all three CVCS HUTs could be full at the same time, PCV-1049 was returned to service with valve 1661 open as soon as the inspector brought the situation to the attention of Plant Management.

CORRECTIVE ACTION TO PREVENT FURTHER NONCOMPLIANCE

To prevent a reoccurrence, plant procedures have been modified to ensure that both the normal and backup CVCS HUT cover gas regulators (PCV-1027 and PCV-1049) remain in service during normal operation except for required maintenance. When routine maintenance is required on these valves, only one valve will be removed from service at a time.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on August 20, 1980. The plant procedures affected were modified on September 30, 1980.

INFRACTION

As required by Technical Specification 6.8.1 written procedures must be established and implemented to satisfy the requirements of Section 5.3 of ANSI N18.7-72. Section 5.3 of ANSI N18.7-72 required maintenance procedures adequate for the correct performance of work.

Contrary to the above, as of August 18, 1980, maintenance instructions had either not been established or had not been implemented resulting in the following nonconforming conditions near the Main Steam Isolation Valves:

1. The electrical junction box containing safety related control circuits of MS-V1-3B had holes in the box and its inspection plate was loose.
2. Freeze protection wiring for the steam break protection system pressure transmitters were missing three conduit body covers. This wiring for the PT-486 condensing pot was missing insulation and appeared to be grounded to the conduit.
3. Five bolts in the seismic support structure for the "A" main steam line were loose.
4. The cable conduit for auxiliary feed pump steam supply valve MS-V1-8B was not fastened either to its support or its junction box.

CORRECTIVE ACTION

The conditions identified in Items 1 through 4 above were restored to a satisfactory conforming condition by August 22, 1980.

CORRECTIVE ACTION TO PREVENT FURTHER NONCOMPLIANCE

To prevent a reoccurrence, the following actions will be taken:

- A. During the system line ups to be performed for the upcoming return to power operation, the operating staff will inspect the Unit No. 2 safety related systems for any similar nonconforming conditions and initiate corrective action.
- B. General instructions will be issued to all plant personnel on the importance of ensuring safety related equipment is in the proper condition for operation. These instructions will also contain guidance on how to initiate necessary corrective action. These instructions will be issued by October 17, 1980.
- C. The Unit No. 2 administrative instructions will be revised so as to reflect the contents of the instructions issued per Item B above in a permanent plant procedure by November 14, 1980.
- D. The Unit No. 2 maintenance instructions will be revised per Section 5.3 of ANSI N18.7-72 so as to provide sufficient guidance to ensure safety related equipment is restored to a proper condition for operation following maintenance activities. This revision will be completed by November 14, 1980.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Since maintenance activities and normal equipment wear and tear will continue throughout the life of the unit, we will consider ourselves to be in full compliance when Items C and D above are completed on November 14, 1980.

DEFICIENCY

As required by 10CFR55, Appendix A, the on-the-job training portion of the continuous operator requalification program must assure that each licensed and senior operator is cognizant of changes to facility design and procedures.

Contrary to the above, as of August 21, 1980, the requalification program did not assure cognizance of the facility changes in that for six changes effective an average of seven months, the completion of required reading had not been satisfied by an average of six licensed and senior operators.

CORRECTIVE ACTION

The licensed operator required reading file was sorted and its contents prioritized such that the required reviews of the oldest items were completed expeditiously. The remaining items were also reviewed in a timely manner. Licensed individuals were reminded of their responsibilities under the requalification program to review facility changes in a timely manner.

CORRECTIVE ACTION TO PREVENT FURTHER NONCOMPLIANCE

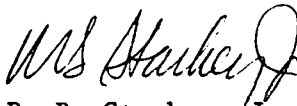
Increased supervisory and licensed operator attention to the contents of the required reading file will prevent further noncompliance and the existing administrative controls governing this portion of the on-the-job requalification program are sufficient to ensure that required reading is documented and accomplished in a timely manner under proper supervisory guidance. However, as an additional check to ensure that all reactor operator license retraining commitments are being met as required, a monthly report showing the status of all licensed personnel review/retraining commitments will be forwarded to the Plant General Manager for information and action as appropriate.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Through proper review, the required reading file has been reduced to include only the most current facility and procedural changes. Therefore, as of this date, we are in full compliance with regard to this item.

If additional information is required, please contact me.

Very truly yours,



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

JFB/tm

cc: V. Stello