

CP&L

Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

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

AIO: 28

Company Correspondence

February 13, 1981

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

Serial:RSEP/81-209

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
UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/80-36

Dear Mr. O'Reilly:

Following is Carolina Power and Light Company's response to the subject report:

Violation

Technical Specification 6.8.1 requires that written procedures and administrative policies shall 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 USNRC Regulatory Guide 1.33 dated November 3, 1972, except as provided in 6.8.2 and 6.8.3 below.

Contrary to the above, written procedures were not established, implemented or maintained in that no procedure for operation of the subcooling meter had been prepared.

This is a Severity Level V Violation.

Carolina Power and Light Company finds that it can neither acknowledge nor deny the alleged violation in view of the unique problems associated with interpreting the requirement of NUREG-0578, TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations. Originally, it was our position that the requirements of Technical Specification 6.8.1, ANSI N18.7, and Regulatory Guide 1.33 were not applicable to the subcooling meter. This position was based on the following:

- a. NUREG-0578, TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations, identified the subcooling meter as a "diagnostic tool" and "...not to be used exclusive of other related plant parameters." This categorized the

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subcooling meter as a backup indication and disallowed operator actions based solely on the margin to saturation as displayed by the subcooling meter. The failure of this meter would therefore not prevent, nor have a significant affect on, continued safe operation of the plant.

- b. Although NUREG-0578 required safety grade temperature and pressure inputs, the calculation device and display which are the heart of the subcooling meter were not required to meet safety grade requirements. In fact, the microprocessor and display needed only be, "...highly reliable, single channel, environmentally qualified, and testable..." provided that procedures for the use of steam tables were available. This in itself implied to us that the subcooling meter was not specifically "safety related" as its failure could be tolerated provided the margin to saturation could be calculated manually.
- c. The subcooling meter is a microprocessor based system which accepts primary pressure and temperature inputs, calculates the margin to saturation based on the lowest pressure and highest temperature, and displays the margin to saturation continuously on an analog meter. The analog meter will display the margin to saturation continuously, regardless of the position of any switch on the microprocessor with the exception of the power on switch. The "Power On" switch is conspicuously marked and considered self-explanatory. The remainder of the switches on the microprocessor will affect only the digital display of the microprocessor and not the analog display of margin to saturation. Since no operator action is required to display the margin to saturation, no operating procedure was provided.

However, based on subsequent discussions with inspectors of your office, we have reconsidered our position and provided an Operating Procedure for the subcooling meter. This procedure was approved for use on November 25, 1980.

Deviation

In an attachment to the CP&L letter entitled "Lessons Learned Short-Term Requirements", dated December 31, 1979, identified with CP&L Serial No. GD-79-3306, it is stated in response to Task Action Plan II.F.2 (NUREG No. 2.1.3.b) - "The use of steam tables are described in the Emergency Instructions for a reactor trip and reactor coolant system depressurization.

Contrary to the above, there is no description on the use of steam tables in the licensee's Emergency Instructions.

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Corrective Action

The Emergency Instruction for reactor trip and for reactor coolant system depressurization both reference a curve of coolant pressure at saturation versus temperature. This curve although it represents an accurate means of performing the function of a steam table was incorrectly identified as a description for the use of the steam tables. Since this was not considered adequate, a procedure for the use of the steam tables was added to the Plant Operating Manual as OP-54B, Manual Calculation of Margin to Saturation.

Corrective Action to Prevent Further Deviation

The addition of a procedure for use of the steam tables to the Plant Operating Manual prevents this deviation from occurring in the future.

Date When Full Compliance Will Be Achieved

Full compliance with this item was achieved on November 25, 1980 with the approval of Operating Procedure OP-54B, Manual Calculation of Margin to Saturation.

Very truly yours,



R. B. Starkey, Jr.
General Manager

H. B. Robinson S.E. Plant

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cc: V. Stello (1)