



Carolina Power & Light Company

April 14, 1981

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FILE: 3513 (R)

SERIAL: NO-81-642

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/80-39

Dear Mr. O'Reilly:

We have received and reviewed the subject report and provide the following response:

Severity Level IV Violation - A

As required by 10CFR50.59(a)(1) changes are allowed to be made to the facility as described in the safety analysis report unless the proposed change involves an unreviewed safety question. FSAR Section 7.2 states that primary protection for the dropped RCC accident is the rod bottom signal derived for each rod from its individual position indication system. FSAR Section 14.1.4, Rod Cluster Control Assembly Drop, describes normal operation of the rod drop signal from any rod position indication channel as initiating protective action by reducing turbine load by a preset amount and blocking of further automatic rod withdrawal.

Contrary to the above, for approximately ten days up to and including December 22, 1980, the turbine runback and automatic rod withdrawal blocks from any individual rod position indicator has been defeated. A review to determine if the change constituted an unreviewed safety question was not performed.

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Response

Carolina Power & Light Company acknowledges the above violation. The reason the rod drop signal from the rod position indication (RPI) channels to the turbine runback and auto rod withdrawal block logic was manually bypassed, was because failures in the RPI System were causing spurious rod drop signals and the exact cause could not be determined. These signals can cause the turbine to run back to 75 percent load which causes the plant to go through a load reduction transient. Requiring the plant to respond to this type of transient is not good operating practice. The personnel involved did not consider this a facility change since the bypass switch is part of the original plant design. Also the RPI signal to the turbine runback and auto rod withdrawal block logic are not required under the H. B. Robinson Technical Specifications for plant operation. It should be noted further that the backup system to the RPI was operable. This backup system is the negative flux rate signal from the power range detectors. Since the backup was operable, there was no increase in risk to the health and safety of the public.

Immediate Corrective Actions

The RPI bypass was immediately disengaged which reinstated the RPI signal to the turbine runback and auto rod withdrawal block. Efforts to identify the faulty RPI continued but because of the intermittent nature of the fault and extremely short duration (generally less than 1 sec.) of the fault on each occurrence progress was slow. On January 27, 1981, the faulty RPI and responsible component were identified and appropriate repairs completed.

Corrective Action to Prevent Recurrence

Administrative procedures have been implemented which require turbine load to be at or below 70 percent when the RPI rod bottom indication bypass is engaged. This will prevent recurrence of the specific actions involved in this notice. On a generic basis, in order to assure that safety analyses will be performed when required in the future, the management of H. B. Robinson Unit 2 has re-reviewed 10CFR50.59 in detail. During this review, the importance of safety analysis documents other than the Technical Specifications, such as the plant FSAR and fuel reload safety analyses, were stressed. We believe these actions provide full compliance with this notice.

April 14, 1981

If you have any questions, please contact me or my staff.

Very truly yours,



B. J. Furr
Vice President
Nuclear Operations Department

FG:DCS:tma*

B. J. Furr, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

My commission expires:

June 5, 1984

Margaret L. Sparks
Notary (Seal)