

DMB

**CP&L**

66 JUN 6

Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550

JUN 02 1986

Robinson File No: 13510E

Serial: RNP/86-2400

Dr. J. Nelson Grace  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT  
UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
REGION II INSPECTION REPORT 86-07

Dear Dr. Grace:

Carolina Power and Light Company (CP&L) provides this response to the violation identified in Inspection Report 86-07.

Severity Level V Violation (RII-86-07-01-SL5)

10CFR50, Appendix B. Criterion V, as implemented by Section 6 of the CP&L Corporate QA Manual, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings and be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above:

- a. Activities affecting quality were not prescribed by documented procedures in that Step 7.3.3 of MST-013 (Revision 3), titled "Steam Generator Water Level Protection Channel Testing (Monthly)," did not require verification that the feedwater regulating valve was in manual which resulted in a reactor trip on January 15, 1986, when the regulator, in automatic control, caused overfeeding of the "A" steam generator.
- b. Activities affecting quality were not accomplished in accordance with documented procedures in that, on January 22, 1986, a technician did not execute Step 7.3.12 of LP-705 (Revision 1), titled "NIS Power Range Channel N41, N42, N43, and N44," which required that N42 be returned to service resulting in a reactor trip when Channel N43 was subsequently tripped for calibration.

8606170066 860602  
PDR ADOCK 05000261  
Q PDR

1/0 IEO1

RESPONSE:

1. Admission or Denial of the Alleged Violation.

CP&L acknowledges the alleged violation.

2. Reason for the Violation.

- a. This part of the violation was caused by an inadequate procedure. MST-013, "Steam Generator Water Level Protection Channel Test" was inadequate because it did not require the technician to verify that the feedwater regulating valve was in manual prior to proceeding to the next step.
- b. The second part of the violation was caused by a failure to follow a documented procedure. Step 7.3.12 of LP-705, "NIS Power Range Channels N41, N42, N43, and N44", was omitted which resulted in two NIS Power Range Channels in test at the same time.

3. Corrective Steps Which Have Been Taken.

- a. A Special Trip Review Committee was established as a part of the Trip Reduction Program to review the circumstances of this event. The Committee eliminated the possible causes to personnel error aggravated by an inadequate procedure and equipment malfunction. The equipment involved was tested and although no failure related root cause was identified, the following corrections were made:

- A loose connection on a test jack in the circuit was identified and tightened.
- Toggle Switch CT-476, which if intermittently defective could have caused the event, was replaced.
- The procedure, MST-013, has been revised to provide additional controls to ensure that equipment is in the proper configuration prior to testing.

Additionally, this event has been reviewed with the personnel involved to ensure that they understand the significance of the events that could result from personnel error.

- b. Regarding the second part of the violation, when the technician was attempting to return Power Range Channel N-42 to normal, he inadvertently entered the wrong cabinet and put N-43 to test which resulted in a reactor trip. To improve the identification of each NIS channel, labeling has been added inside each cabinet beside the bistable switch which identifies the associated NIS Channel. Additional labeling clearly identifying the NIS Channel via color coding has been installed near the lock on each cabinet door. The technician involved in this event was counseled and formally reprimanded by his management.

A "Trip Reduction Assessment Program" has been formally established to review reactor trips at Robinson and events at other plants that may create potential trips at Robinson. The program, just recently implemented, provides formal analysis for root causes with emphasis placed on the adequacy of repair and prevention of recurrence.

4. Corrective steps which will be taken:

Completed.

5. Date When Full Compliance Will Be Achieved:

With the completion of the corrective actions identified above, full compliance has been achieved.

If you have any questions concerning this response, please contact Mr. J. M. Curley at (803)383-4524, Extension 2367.

Very truly yours,



R. E. Morgan  
General Manager  
H. B. Robinson S. E. Plant

RCA:sdm

cc: H. E. P. Krug  
Document Control Desk