



USNRC REGION 1
ATLANTA, GEORGIA

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT A 8: 50
Post Office Box 790
Hartsville, South Carolina 29550

MAR 02 1981

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

Serial:RSEP/81-345

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. 50-261/81-02

Dear Mr. O'Reilly:

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

Severity Level V Violation - A

"Technical Specification 6.8.1 requires written administrative policies to be established that meet or exceed the requirements and recommendations of Appendix A to Regulatory Guide 1.33, dated November 3, 1972. The Guide endorses ANSI Standard N45.2-1971. Section 16 of the standard requires measures to be established to control items which do not conform to requirements.

Contrary to the above, as of January 7, 1981, measures were not established to control nonconforming Containment Pressure Indicator PI-951 and its associated containment isolation engineered safety feature. PI-951 performance indicated the possibility that its associated engineered safety feature would actuate nonconservatively, yet the channel was allowed to continue in service."

Response

The Carolina Power and Light Company acknowledges that Containment Pressure Indicator PI-951 and its associated containment isolation engineered safety feature had not been placed under the control of the appropriate administrative procedures at the H. B. Robinson S.E.G. Plant at the time of the subject inspection. During the daily (for containment pressure indicators) channel check the operators should have recognized that PI-951 was deviating excessively in the nonconservative direction from the remaining containment pressure indicators and taken immediate steps to insure that the minimum degree of redundancy required by Technical Specification Table 3.5-3 was met.

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This could have been accomplished by declaring the channel inoperable and inserting a "trip" signal until the status of the protection logic could be determined. If the condition had been recognized by the operators, the instrument would have been taken out of service in accordance with existing procedures while maintaining the minimum degree of redundancy required for protection.

Immediate Corrective Actions

The immediate corrective actions taken were as described in Paragraph 5.a of the subject inspection report. The indicator "drift" observed was verified to exist only in the indication function of this channel. The protective function of this channel was unaffected. Therefore, the possibility of nonconservative safety circuit operation did not exist in this case.

Corrective Action To Prevent Recurrence

The H. B. Robinson Plant has in place sufficient administrative controls to adequately control malfunctions of this nature once the condition is identified. To help insure indicator "drift" is quickly identified, guidance, in the form of an operating note or standing order, will be provided to the operators concerning the maximum acceptable deviation between redundant indicators (as observed during the daily or once a shift channel checks) which may exist without requiring corrective action. This guidance will also address acceptable corrective actions and the measures to control instrumentation which is considered to be going out of tolerance but remains a reliable trend indicator and instrumentation which is in error by a known amount. This guidance will be available by March 31, 1981.

Severity Level V Violation - B

Technical Specification 6.8.1 requires written administrative policies to be established that meet or exceed the requirements and recommendations of Appendix A to Regulatory Guide 1.33, dated November 3, 1972. The Guide endorses ANSI Standard N45.2-1971. Section 2 of the standard requires the Quality Assurance program to identify the items and services to which quality standards apply.

Contrary to the above, as of January 9, 1981, written administrative policies did not identify the instrumentation to which quality standards apply (Nuclear Instrumentation System excepted).

Response

The identification of instrumentation and electrical equipment including spare parts in stock, to which quality standards apply, is addressed in Volume 20 of the POM by Procedure ENG-2, "Q-List Control Procedure". Section 3.1.3 of this procedure states that Q-List determination may be required to be made by plant personnel on a case-by-case basis for instrumentation, electrical components and spare parts. These determinations are made with the information

provided in Section 3.0 and Appendix II of this procedure, "Q-List General Criteria and Detailed Listing". Although a detailed listing of all equipment to which quality standards apply has not been generated for the Robinson Plant, the Carolina Power and Light Company believes that instructions for making the necessary decisions on components not specifically listed are adequately addressed in this procedure and that this procedure complies with the intent of Section 2 of ANSI 45.2-1971. Therefore, although some improvement can be made in the detail of the guidance provided, Carolina Power and Light Company does not believe it appropriate to admit to the violation as stated.

It should be noted, however, that prior to the subject inspection, it was realized that a more detailed procedure (with guidelines consistent between all Carolina Power and Light Company nuclear plants) was needed to more precisely address Q-List determination criteria. The end result will be the ability to identify all components (including instrumentation and electrical equipment) down to the level of spare parts and the reduction of the amount of judgement on the part of the individual making the determinations in the field. Accordingly a task force was organized on the corporate level in early November, 1980 for this purpose. This procedure, developed by the task force members in concert with other personnel, is now in the draft stage.

Although Carolina Power and Light Company does not agree with this violation as stated, we have, as indicated above, identified for ourselves areas for improvement regarding the Q-List and have taken action accordingly. This information is provided as demonstration of our commitment to an effective Quality Assurance program. The program improvements will be implemented as they are developed with the more detailed Q-List determination criteria completed by March 1, 1982.

Deviation From a Commitment to the NRC

"CP&L Letter GD-79-8806, dated December 31, 1979 "Lessons Learned Short Term Requirements" committed to complete implementation of Requirement 2.1.3.b as clarified in Enclosure 1 of NRR Letter dated October 30, 1979 "Discussion of Lessons Learned Short Term Requirements". This was made by the installation of a highly reliable, redundant channel core subcooling monitor which provides a continuous online indication of primary coolant saturation condition. The clarification had required at least a highly reliable single channel utilizing temperature input from each hot leg or the use of multiple core exit thermocouples.

Contrary to the above, as of January 7, 1981, the core subcooling monitor was no longer installed as committed in that the single channel which was energized utilized temperature input from only one hot leg and one core exit thermocouple."

Response

The Robinson Plant staff acknowledges that the core cooling monitor was in a condition at the time of the inspection which deviated from the literal interpretation of our December 31, 1979 letter to the NRC referenced in your inspection report. The cause of this deviation was our decision to upgrade the core cooling and containment monitoring cabinet (the core cooling monitor is housed in this structure) to a seismically qualified structure. This upgrading was delayed until near the end of the 1980 refueling outage by a lack of the necessary materials to complete the modification.

The Robinson Plant staff involved in making the decision to degrade the core cooling monitor recognized that, no matter how reliable a piece of equipment is constructed, it still will occasionally be out of service for brief periods for corrective or preventive maintenance (Section 2.1.3.b of NUREG-0578 acknowledges that the core cooling monitor could be out of service by requiring that "...a backup procedure for use of steam tables be available to the operator."). The individuals involved also recognized the desirability of and benefits from upgrading this structure to a seismically qualified structure in light of possible future requirements. Thus, the individuals involved in no way considered their actions to deviate from the intent of our December 31, 1979 letter. The actions taken were evaluated in light of our proposed Technical Specifications regarding the core cooling monitor (which had been submitted as a part of the category "A" TMI requirements proposed Technical Specifications), and the several alternate methods of determining core subcooling which are available to the operators and are required to be in place by Section 2.1.3.b of NUREG-0578. The decision reached was that the plant's safety would not be degraded during the brief period of time which was required to upgrade the core cooling monitor, and that our actions were in accordance with our proposed Technical Specifications regarding the core cooling monitor and the intent of our December 31, 1979 letter.

Immediate Corrective Actions

The immediate corrective actions taken were as described in Paragraph 5.c of your subject letter. Since the inspection, the core cooling monitor upgrading has been completed with both channels being powered from their permanent power supply and with all input problems resolved.

Corrective Actions To Prevent Recurrence

The core cooling monitor is a passive system with the only moving parts being the meter movements and switches. Thus, there is no known reason to suspect that at least one channel of the core cooling monitor could not be in continuous service during unit operation above 350°F. However, since the core cooling monitor is a new system with little operating history, the Robinson Plant intends to operate the core cooling monitor in accordance with our proposed Technical Specification for this system. No further corrective actions are considered necessary.

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

Very truly yours,




R. B. Starkey, Jr.
General Manager

H. B. Robinson S.E. Plant

Sworn to and subscribed before me this 2nd day of March, 1981.

My commission expires: June 4, 1984


Notary Public

JFB/tm

cc: V. Stello (1)