



Carolina Power & Light Company

March 23, 1981

USNRC REGION II
ATLANTA, GEORGIA

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FILE: NG-3513 (R)

SERIAL: NO-81-494

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. 50-261/81-03

Dear Mr. O'Reilly:

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

Severity Level IV 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.

Contrary to the above, the licensee failed to establish an adequate maintenance procedure, in that on January 14, 1981, a licensee employee working under a clearance issued per Operating Work Procedure No. CVC-6 de-energized the heat trace circuits for both the "A" and "B" Boric Acid transfer pumps, thus violating a limiting condition for operation."

Response

The H. B. Robinson Plant reported this event in our Licensee Event Report (LER) 81-003 dated January 28, 1981, Serial: RESP/81-124. The causes of the event and the immediate corrective actions taken were as described in our LER 81-003. The corrective actions to prevent recurrence described in our LER 81-003 have also been completed. No further corrective actions are considered necessary at this time.

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Severity Level V 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.

Contrary to the above, the licensee failed to maintain adequate annunciator warning procedures in that of 454 annunciator windows reviewed on the Reactor, Turbine, Generator Board (RTGB), twelve errors were found which were typified by failure to have a current procedure and incorrect identification of the window."

Response

The H. B. Robinson Plant staff acknowledges that the status of the RTGB annunciators and annunciator procedures was as described above at the time of inspection. The twelve discrepancies identified ranged in severity from minor differences in wording between the actual RTGB annunciator window and the wording as it appeared in the annunciator procedures, to a lack of annunciator procedures for certain annunciator windows.

Designation of Apparent Cause

The more significant of the twelve annunciator procedure deviations involving a lack of or incorrect annunciator procedures have apparently been caused by an inadvertent, but significant, time delay between the installation of some plant modifications affecting the RTGB annunciators and the incorporation of the revised annunciator procedures (which are a part of the individual plant modification packages) into the Plant Operating Manual. The H. B. Robinson Plant staff does not believe that the differences between the actual RTGB annunciators and the annunciator procedures which are only minor--one or two word differences--constitute sufficiently significant deviations so as to cause the affected procedures to be inadequate or unusable. However, these minor deviations will also be eliminated during the annunciator procedure revisions which are required to correct the more significant deviations described above.

Immediate Corrective Actions

The immediate corrective actions being taken to resolve the twelve identified deviations include:

1. Procedure changes to the plant annunciator procedures to eliminate the minor wording differences which exist between the actual RTGB annunciator windows and the annunciator procedures, and to correct for the missing or outdated annunciator procedures, and

2. Minor wording changes in a few of the actual RTGB annunciator windows so that the window will more accurately reflect the conditions being annunciated and agree with the wording contained in the associated annunciator procedures.

Item (1) above has been completed. Item (2) above should be completed by April 30, 1981, barring any unforeseen delays in obtaining the replacement windows.

Corrective Action To Prevent Recurrence

The H. B. Robinson Plant staff will complete two actions to prevent a recurrence of this violation. The first action (which is in progress) consists of a thorough review of the RTGB annunciators, annunciator procedures, and the plant modification packages for completed or partially completed modifications. This review will identify, and initiate corrective actions for, any remaining inconsistencies or errors in the annunciator procedures. This review will be completed by May 31, 1981.

The goal of the second action which will be taken is to prevent a long delay between the installation of a plant modification and the incorporation of the associated procedure changes into the Plant Operating Manual in the future. Administrative controls exist at the Robinson Plant to ensure that procedure changes required following plant modifications are implemented. However, to ensure timely implementation of the procedure changes, the appropriate plant engineer must initiate the procedure change following the hardware installation and testing. Therefore, members of the Robinson Plant staff who can be assigned the responsibility for the development and/or coordination of plant modifications will be reminded, by review of this letter, of the need to implement the procedure changes associated with a plant modification in a timely manner following the installation, testing, and acceptance of the modification. This review will also be completed by May 31, 1981.

Date When Full Compliance Will Be Achieved

The annunciator procedure changes required to correct the twelve identified errors have been completed. Since the minor changes to the wording as it appears on the actual annunciator windows (as described earlier) are only being made to ensure the wording agrees exactly with the correct and current annunciator procedures, the H. B. Robinson Plant staff considers the plant to be in full compliance with Paragraph 6.8.1 of the Technical Specifications in regard to the RTGB annunciator procedures. The remaining actions will be completed as described above to ensure the Robinson Plant remains in full compliance.

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

Yours very truly,

Original Signed By

B. J. Furr

B. J. Furr

Vice President

Nuclear Operations

JFB:SHC:ejj*

cc: Mr. Victor Stello

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.

Beverly K. Menges
Notary (Seal)

My commission expires:

Nov. 17, 1982