



Carolina Power & Light Company

UDIRC REGION II
ATLANTA, GEORGIA

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

APR 8 4:30

April 3, 1981

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

Serial:RSEP/81-566

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. 50-261/81-05

Dear Mr. O'Reilly:

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

Severity Level V Violation

"Technical Specification 6.8.1 requires that written procedures be established in accordance with ANSI N18.7-1972 for changing modes of operation of safety-related systems and for correcting off-normal conditions for those events where system complexity may lead to operator confusion.

Contrary to the above, following significant modifications to the reset capability of the Engineered Safety Features (Safety Injection) installed during the August - October, 1980 refueling outage, no written procedure was established or implemented for returning systems to normal alignments after a safety injection signal. This lack of a procedure resulted in improper resetting of the instrument air containment isolation valves during the transient experienced January 29, 1981."

Response

The H. B. Robinson Plant staff acknowledges that a single procedure for returning equipment to a normal lineup following a safety injection signal is not available to the Unit No. 2 operators.

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Designation of Apparent Cause

In the past, a combination of several procedures was used to recover from an inadvertent safeguards initiation event at Robinson, Unit No. 2. The equipment affected by a safeguards initiating signal is listed in Emergency Instruction One (E.I.-1), "Incident Involving Reactor Coolant System Depressurization". This list of affected equipment plus the normal operating procedures for the equipment were used in combination to restore the equipment to normal conditions. After the modifications to the reset capability of the safeguards system, which involved the containment isolation valves for the steam generator blowdown and sampling, instrument air, nitrogen supply to the pressure relief tank, some of the gas analyzer sample points, and containment air sampling, the appropriate normal operating procedures and system descriptions were revised to reflect the additions. The intent of E.I.-1 was not altered by the modifications since the affected valves would remain in the "safe" (closed) position following the reset of the safeguards initiation signal. During the mitigation of an actual event, the safeguards initiation signal would be reset only to allow some components to be secured to minimize unnecessary operation and conserve them for later use. Thus, no revisions to E.I.-1 were made, and, at the time, the modifications did not seem sufficiently complex as to warrant procedure additions other than revisions to the existing operating procedures.

Immediate Corrective Actions

A procedure for recovery from an inadvertent safeguards system initiation is being developed and will be implemented by April 30, 1981.

Corrective Action To Prevent Recurrence


To determine if additional corrective actions are necessary, our procedures are being reviewed to determine if there are any other generic implications which should be considered. Also, this item has been "flagged" to the plant training personnel for consideration in future license training and retraining. These additional corrective actions will be complete by April 30, 1981.

Date When Full Compliance Will Be Achieved

Full compliance should be achieved in regard to this violation when the immediate corrective action and action to prevent recurrence is completed as described above on April 30, 1981.

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

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R. B. Starkey, Jr., 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.

Susan L. Andrews
Notary Public

My commission expires: *June 4, 1984*

JFB/tm

cc: V. Stello (1)