



Carolina Power & Light Company

April 21, 1981

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FILE: NG-3513 (R)

SERIAL: NO-81-686

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. 50-261/81-08

Dear Mr. O'Reilly:

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

Violation - Severity Level IV

Technical Specification 6.8.1 requires that written procedures be established and implemented which satisfy the requirements of Section 5.1 of ANSI N18.7-1972. Section 5.1 of ANSI N18.7-1972 requires that procedures and performance testing be adequate to assure proper functioning of safety-related components on completion of modifications.

Contrary to the above, as of January 29, 1981, procedures and performance testing were inadequately established and implemented, such that the breaker overload trip settings on all four motor operated containment isolation valves for the Fire Suppression System were improperly set. As a result, one valve did not close upon receiving a containment isolation signal.

Response

Carolina Power & Light Company acknowledges the above violation. The failed breaker, which was installed with the plant at cold shutdown, was actually the third breaker installed during implementation of a fire protection modification. The first two breakers were installed during the 1980 refueling outage (October, 1980). The original breaker was undersized and required replacement. A second breaker was installed temporarily while a replacement breaker was on order. The third (permanent) breaker when received was then

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used to replace the temporary breaker. The first two breakers were installed in accordance with the modification installation procedure, and post-installation testing was performed. However, for the third installation the appropriate procedures were not used. It appears that the personnel involved may have assumed that the implementing procedure and startup testing requirements had been satisfied (signed off) following the installation of the second set of breakers.

Additionally, review of the installation procedure revealed that information regarding how to adjust the setpoint was inadvertently omitted. This information was identified in the procedure as "to be provided later" but was never provided. The valve that failed upon receiving a Phase "A" containment isolation signal was manually isolated. In addition the redundant isolation valve had shut; therefore, there was no threat to the public health and safety.

#### Immediate Corrective Action

The breakers for all four motor operators were readjusted and tested, in accordance with approved procedures, to ensure proper operation. Upon identification of this event following a spurious SI indication, a review by plant personnel was begun, and LER 81-006 was forwarded to the NRC.

#### Corrective Action to Prevent Recurrence

To prevent recurrence of this event, LER 81-006 will be forwarded for review to all the organizations involved in the breaker installation. Appropriate personnel in each organization will be required to review the event and take actions necessary to 1) ensure that personnel follow all implementing procedures and, 2) ensure that implementing procedures provide sufficient details and instructions for the setting and establishment of setpoints on parameters affecting operation of equipment. This review will be complete by June 1, 1981.

This inspection report states that LER 80-004 described events which are very similar to this event. The report also states that the corrective actions reported in LER 80-004 are similar to those reported in LER 80-006 and therefore are not adequate. Carolina Power & Light Company would like to clarify these two events. LER 80-004 reports on the trip of motor control center MCC-5. The MCC-5 trip was a result of an overcurrent trip of the MCC-5 main power transfer switch. A modification to the MCC-5 power supply consisted of replacing an existing knife switch with a pair of Kirk-Key interlocked Square-D K-600 breakers. The K-600 breakers were intended to provide a method of switching power sources to MCC-5 while under load and were not intended to be used as overcurrent protection devices. Due to this fact, the requirement for proper overcurrent trip settings for the K-600 breakers was not

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provided and the breakers were shipped and installed using standard factory settings. This work was performed by a different organization than that involved in the event described in this report. The personnel involved in the MCC-5 event were required to review the proper use of transfer switches and adjustable breakers. This report, however, described events resulting from actions which were performed by an organization not involved with the MCC-5 event and therefore not included in the subsequent corrective actions. Also, the errors described in this report involve an incomplete modification package and failure to perform post-installation testing. For these reasons, Carolina Power & Light Company considers the corrective actions described above to be sufficient to prevent recurrence in spite of the perceived similarity between the events.

Carolina Power & Light has found that it will require additional time to respond to the deviation noted in Appendix B of the subject IE Report. Our response will be submitted by April 30, 1981. This was discussed with Mr. R. Butcher of your staff on April 17, 1981.

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

Yours very truly,



B. J. Furr  
Vice President  
Nuclear Operations

DCS:ejj\*

cc: Mr. V. 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.

Margaret L. Sparks  
Notary (Seal)

My Commission expires:

June 5, 1984