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Carolina Power & Light Company
June 26, 1981

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FILE: NG-3513(R)

SERIAL No.: NO-81-1100

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. 50-261/81-15

Dear Mr. O'Reilly:

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

Violation A - Severity Level IV

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained to satisfy the requirements of Section 5.1 of ANSI 18.7-1972. Section 5.1 of ANSI 18.7-1972 requires that the maintenance program maintain safety-related equipment at the quality required for it to perform its intended function. This program is implemented by Robinson Maintenance Instruction-2 and Administrative Instructions Section 2.1.30, which require plant personnel to initiate work requests to correct safety-related equipment degradation.

Contrary to the above, as of April 13, 1981, the maintenance program had not been implemented in that work requests had not been initiated on the following nonconforming conditions in the primary sampling system:

1. The switch controlling the containment isolation valves for the pressurizer liquid space sample was taped open due to a valve control circuitry malfunction.
2. The closed position indications for seven of the eight sample system containment isolation valves were not functional.
3. The position indications for six of the eight other sample system valves, which are part of the reactor coolant pressure boundary, were not indicating properly.

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Response

Carolina Power & Light Company (CP&L) acknowledges the above violation. A description of this event is given in LER 81-011, dated April 27, 1981. In addition to the LER the following information is provided. The primary sample system control panel has had a history of maintenance problems. In the past, Work Requests (WRs) have been issued to repair the sample system valve control switches and valve position indicators. Early investigations into these failures had shown that the problem was with the valve position indicator arm on the valve stem. A mechanical guide was installed on the valves which were first reported. However, some of the valve position indicators which have more recently been repaired have subsequently failed again. As a result of this past history and a belief on the part of laboratory technicians that the sampling system indication panel was not vital safety equipment (the sample lines are 3/8 inch tubing), the technicians had become somewhat complacent about sample panel components. This explains why the technician taped open the sample valve control switch instead of having it properly repaired. This also explains why some of the valve position indicator lights had not been repaired.

Corrective Action

Work Requests were issued on April 13 to repair the valve switch and the valve lights. Additional WRs have been issued to maintain the operability of the lights. Laboratory personnel have been instructed as to the importance of issuing WRs to keep all equipment in a fully functional and operable condition.

Corrective Action to Prevent Recurrence

A procedure revision was implemented on June 22, 1981, which requires radiation and chemistry technicians to report equipment malfunctions to their foreman for appropriate follow-up action.

The inspector noted in this inspection report the similarity between this violation and IE Inspection Report 80-21, Infraction B. The corrective action for Infraction B included general instructions for all plant personnel on the importance of maintaining plant equipment. In addition to these general instructions specific retraining was given to those plant personnel normally associated with the operation of plant equipment; operators and maintenance personnel. Laboratory technicians were not given a detailed review. However, the training given as a result of this report has corrected this omission.

Violation B - Severity Level V

Technical Specification 3.6.1.a requires that containment integrity shall not be violated unless the reactor is in the cold shutdown condition. As defined in paragraph 1.7 of Technical Specifications, containment integrity requires that all automatic containment isolation trip valves required to be closed during accident conditions are operable or secured closed.

Contrary to the above, on April 13 and 14, 1981, during power operation, the switch for the two containment isolation valves for the pressurizer liquid space sample was taped open for sampling, making the valves unable to respond automatically to a containment isolation signal.

Response

Carolina Power & Light Company (CP&L) acknowledges the above violation. A description of the cause of this event is given in LER 81-011, dated April 27, 1981. LER 81-011 also describes the immediate corrective actions taken by CP&L and the actions taken to prevent recurrence. CP&L will be in full compliance with the above corrective actions August 1, 1981, as reported in the LER.

Violation C - Severity Level V

Technical Specification 4.4.3 requires that the residual heat removal system be tested for acceptable leakage rates on a twelve month interval. This surveillance requirement is implemented by Plant Periodic Test 14.0, Residual Heat Removal System Integrity Test (Annual).

Contrary to the above, as of April 13, 1981, Periodic Test 14.0 had not been conducted annually and had been overdue as of February, 1981.

Response

Carolina Power & Light Company (CP&L) acknowledges the above violation. A description of the cause of this event is given in LER 81-012, dated May 13, 1981. LER 81-012 also describes the immediate corrective actions taken by CP&L and the actions taken to prevent recurrence. CP&L will be in full compliance with the above corrective actions by June 30, 1981, as reported in the LER.

Violation D - Severity Level V

Technical Specification 4.4.2.a requires that containment isolation valves be tested for operability at each refueling. Operability requires that the valves be capable of performing their intended function. As stated in FSAR Tables 5.2.2 - 1E and 1H, the letdown line and the containment air sample lines are automatically isolated on a Phase A Containment isolation signal.

Contrary to the above, as of April 15, 1981, no surveillance procedure verifies that the containment isolation valves for the letdown line and for the containment air sample lines properly respond to a Phase A containment isolation signal.

Response

Carolina Power & Light Company (CP&L) acknowledges the above violation. A description of the cause of this event is given in LER 81-013 Revision 1, dated May 15, 1981. LER 81-013 Revision 1 also describes the immediate corrective actions taken by CP&L and the actions taken to prevent recurrence. CP&L will be in full compliance with the above corrective actions prior to the next refueling outage when the valves are to be tested again.

Deviation From a Commitment to the NRC

CP&L letter GD-79-3306, Lessons Learned Short Term Requirements, dated December 31, 1979, reported CP&L implementation of Requirement 2.1.6.a as clarified in enclosure 1 of NRR letter dated October 30, 1979, Discussions of Lessons Learned Short Term Requirements. This letter committed the licensee to a leak reduction program as a periodic test with an annual frequency. Periodic Test 2.12, Safety Injection System (Boron Injection Tank) Integrity Test was established to satisfy this commitment.

Contrary to the above, as of April 13, 1981, Periodic Test 2.12 had not been performed annually. This test was overdue as of March, 1981.

Response

Carolina Power & Light Company acknowledges the above deviation. To meet the leak reduction commitment plant personnel generated Special Procedure-588 which was successfully performed on December 11, 1979. This special procedure was then added to the Plant Operating Manual (POM) Volume 10 as a Periodic Test, "PT 2.12 Safety Injection (Boron Injection Tank) Integrity Test," on December 31, 1979. However, this new PT was not subsequently added to the Table of Contents for Volume 10 of the P.O.M. Since the yearly master schedule for PT's is generated from the Table of Contents for Volume 10, PT 2.12 was inadvertently not scheduled for 1980.

Immediate Corrective Action

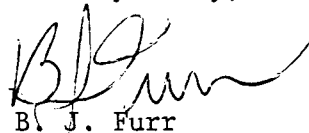
PT 2.12 was immediately performed April 14, 1981, and successfully completed on June 10, 1981. The reason for the long time to completion on this PT was that some of the valves needed to have the packing replaced and this could not be completed until the plant was in a cold shutdown condition. PT 2.12 was also added to the Table of Contents of P.O.M. Volume 10.

Corrective Action to Prevent Recurrence

Plant personnel are currently reviewing all PT's to ensure that they are in the Table of Contents to P.O.M. Volume 10 and referenced in other appropriate procedures. They are also investigating other corrective actions that will ensure that future new plant procedures are adequately referenced in the appropriate sections of the Plant Operating Manual. The above reviews and procedure changes will be completed by September 30, 1981.

If you have any questions, please contact my staff.

Yours very truly,



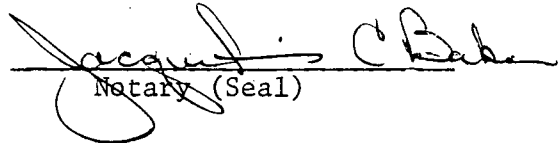
B. J. Furr

Vice President

Nuclear Operations Department

FMG/dk (1302)

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.


Notary (Seal)

My commission expires: Feb. 25, 1985