



USNRC REGION I
ATLANTA, GEORGIA

Carolina Power & Light Company

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

SEP 25 1981

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

Serial: RSEP/81-1640

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 I.E. INSPECTION REPORT NO. 50-261/81-22

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following responses.

Severity Level VI Violation - 81-22-04

Technical Specification 6.8.1 requires that procedures be implemented that meet or exceed the requirements of Section 5.3 of ANSI 18.7-1972. The requirements of Section 5.3.9 of ANSI 18.7-1972 with regard to control of storage and preservation of materials and equipment to prevent damage or deterioration is implemented by Volume 21, Storeroom Procedure-3 of the Plant Operating Manual. This procedure requires that safety-related motors be stored in a heated, well-ventilated building to prevent condensation and corrosion and that the temperature be maintained between 40° and 140°F. This procedure additionally requires that hazardous chemicals, paints, solvents and like materials be stored in well-ventilated areas not in close proximity to quality assurance review items.

Contrary to the above, as of July 16, 1981, the storage procedures had not been implemented in that the following were stored improperly:

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- (1) A spare safety-related service water pump motor was stored in an area having no temperature control or monitoring systems and with the ventilation fan secured.
- (2) Hazardous chemicals and flammable solvents were stored in an unventilated building and in proximity to quality controlled hydrogen peroxide.

1. Admission Or Denial Of The Alleged Violation

Carolina Power and Light Company acknowledges the above violation.

2. Reason For The Violation

Storage space requirements for items requiring Quality Assurance (QA) review have exceeded the planned warehouse space. Therefore, some large items, including the service water motor, were stored in another warehouse that was ventilated and where the temperature was not expected to decrease below 40°F except for a few days each year during which supplemental heating could be provided. However, sometime before July 16, 1981, the overhead ventilation fan was inadvertently left off following a rewiring of the warehouse.

Additionally, chemicals from various storage locations onsite were relocated in a common warehouse to minimize the possibility of accidentally spilled chemicals damaging safety related components. This warehouse does not have a mechanical ventilator. However, natural circulation of air does provide some continuous air exchange. During a re-arrangement of the chemical storage warehouse, to accommodate changes in stock level, an item requiring QA review (Hydrogen Peroxide) was stored in the proximity to these hazardous chemicals.

3. Corrective Steps Which Have Been Taken And The Results Achieved

The warehouse containing the Service Water Motor was inspected. Ventilation adequate to assure that the warehouse temperatures remain in the required range of 40° - 140°F during the spring, summer and fall months was established by returning the ventilation fan to service. Temperature control during the winter months will be provided by a heating system.

A survey of the warehouse used for chemical storage was conducted by the Environmental and Chemistry Subunit to ensure that the proper chemical storage segregation was maintained. A few chemicals were re-arranged. QA controlled hydrogen peroxide was removed to a storage area separate from hazardous chemicals and flammable solvents. Natural circulation will provide a minimal air exchange until a mechanical ventilator can be installed.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

To avoid condensation accumulation on the service water motor and on other items that are stored in this area, the area will be maintained within the 40° - 140°F range. Monitoring of the warehouse temperature will be provided by installed thermometers.

A procedure for proper segregation of chemical storage will be developed to assist the stockroom personnel during re-arrangement of stock.

Mechanical ventilation will be provided to the warehouse used for chemical storage.

A study is underway to locate additional bulk and chemical storage facilities onsite.

5. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the implementation of a chemical storage procedure by December 15, 1981. Installation of a mechanical ventilation system in the warehouse used for chemical storage will also be done by December 15, 1981.

Very truly yours,



R. B. Starkey, Jr.
General Manager

H. B. Robinson S.E. Plant

_____, 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.

My commission expires:

Notary (Seal)

CLW/tm

IE INSPECTION REPORT

bcc: Principal Engineer, Nuclear Licensing Unit
Principal Specialist, Regulatory Compliance
Director of On Site Nuclear Safety
Vice President, Nuc. Plant Engineering
Manager, Operations QA
Nuclear Operations Department File
Vice President, Nuclear Operations
Manager, Nuclear Fuels
Vice President, Nuclear Safety & Research
Attorney
Manager, Env. & Rad. Control
NRC Resident Inspector
Principal Engineer, On Site Nuc. Safety
PNSC

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- C. S. Bohanan
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- B. H. Webster
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