CP&L
Carolina Power & Light Company

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

OCT 23 1981

Robinson File No: 2-O-4-a-4 Serial: RSEP/81-1789

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. 50-261/81-26

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 V Violation (IER-81-26-09)

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements of ANSI N18.7-1972, Sections 5.1 and 5.3. Administrative Instructions, Section 11.11.3 of the Plant Operating Manual implements the ANSI requirements and requires that safety-related wire removal activities be properly classified, authorized, and conducted with independent verification.

Contrary to the above, as of September 3, 1981, procedures for wire removal activities that modified the auxiliary feedwater relay coils to allow opening of the steam generator blowdown valves while low steam generator levels existed were not implemented in that; (a) the activity was incorrectly deemed non-safety-related, (b) formal approval for the activity was not obtained, and (c) wire removal occurred without independent verification.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the above violation.

2. Reason for the Violation

While shutdown, both the low steam generator level signal and the main feedwater pump breaker open signal which automatically closes the steam generator blowdown valves were defeated in order to drain the steam generators for maintenance. The wire removals performed were documented in the non-safety-related jumper log. The violation resulted by not recognizing that this activity should have been entered in the safety-related wire removal log which requires additional approval and verification of the wire removal and re-installation.

Classifying the activity as non-safety-related was partly due to the steam generator blowdown valves wire removal being used during a plant condition in which the Residual Heat Removal System was operating and the steam generator was no longer required to remove heat from the reactor. Thus, in and of itself, the wire removal activity had no effect on nuclear safety as long as the plant remained in a condition where the steam generators were not required. However, it was not considered that during other plant conditions, plant safety could be compromised if the steam generator blowdown valves closing signal was not properly re-installed.

3. The Corrective Steps Which Have Been Taken and the Results Achieved

Following the identification of the violation on September 4, all shift foremen and shift engineers were notified concerning the violation and its relationship to a similar problem identified in July, 1981. The shift foremen were instructed to review their use of the safety-related and non-safety-related jumper and wire removal logs and the procedures that govern their use. They were also instructed to resolve any future questions concerning jumper and wire removal activities with their supervisor if they were unclear as to whether a particular jumper or wire removal was safety-related or not. This review was completed by September 9, 1981.

An investigation was initiated to determine if any other jumper or wire removal activities were being considered non-safety-related when they should be considered safety-related. No activities other than the ones connected with steam generator blowdown valves were identified.

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

To resolve the use of wire removals when draining the steam generators, CP&L plans to control the defeat of the closure signal to the steam generator blowdown valves by means of key lock switches.

Operation of these switches will be controlled by the plant heatup and cooldown procedures, General Procedures GP-2 and GP-5 and will ensure proper positioning under various plant configurations. The installation of these switches will eliminate the requirement for using jumpers or wire removals to accomplish the activities that are required during plant shutdown.

5. The Date When Full Compliance Will Be Achieved

The key lock switches and procedure revisions will be implemented during the upcoming 1982 refueling outage.

Very truly yours,

R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

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.

My commission expires:

June 4, 1984

Susan L. Andrews
Notary (Seal)

CLW/tm