CP&L
Carolina Power & Light Company

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

DEC 2 4 1981

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

Serial: RSEP/81-2093

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. 81-31

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-81-31-04

Technical Specification 6.8.1 requires that written procedures be implemented that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972.

Contrary to the above, on November 8, 1981, an operator failed to follow valve lineup procedure OP-38A for positioning valve RHR-764 from the locked open to the locked shut position. This resulted in a cooldown rate of about 70°F/hour on initiation of residual heat removal cooling. This exceeded the licensee's administrative cooldown rate limits as specified in General Procedure - 6, Plant Cooldown.

1. Admission of the Alleged Violation

Carolina Power and Light Company acknowledges the above violation.

2. Reason for the Violation

On November 8, 1981, the Residual Heat Removal System was placed in service for normal plant cooldown in accordance with Plant General Operating Procedure (GP-6). Within a few minutes after placing the Residual Heat Removal System in operation, the control room operators

attempted to reduce the rate of heat removal from the Reactor Coolant System by throttling flow through the Residual Heat Removal System heat exchangers by shutting RHR-HCV-758, the residual heat removal heat exchanger outlet flow control valve. Actions aimed at reducing the cooldown rate, proved unsuccessful. The cooldown was terminated at approximately 1250 when the residual heat removal loop return isolation valves RHR-744A and RHR-744B were closed. During the 50 minutes which elapsed, the Reactor Coolant System temperature was reduced from 340°F to 271°F. The maximum cooldown rate achieved was determined to be 69°F/hour which exceeds the plant's administrative cooldown limit of 60°F/hour which applies to cooldown within the range of 350°F down to 300°F. However, the Technical Specifications cooldown limit of 100°F/hour was not exceeded at any time during the evolution. Operations personnel rechecked all valve lineups which had been performed in preparation for placing the Residual Heat Removal System in operation and discovered valve RHR-764 to be locked open. H. B. Robinson procedure OP-38A requires this valve to be locked shut in preparation for placing the Residual Heat Removal System in operation. The OP-38A valve checklist had been completed on the 0000 through 0800 shift on November 8, 1981.

After discovery of the error, valve RHR-764 was placed in the locked closed position and the Residual Heat Removal System was later placed in normal operation.

Valve RHR-764 had been left in the incorrect position during the performance of OP-38A. The auxiliary operator involved had completed his portion of the checklist in a somewhat hurried manner due to the high radiation levels which are present in the room where valve RHR-764 is located (Residual Heat Removal Heat Exchanger Room). The light bulbs in the normally unoccupied room were recently changed; however, the breaker for the room lights was turned off. The operator performed the lineup by flashlight thinking the lights were still burned out. Valve RHR-764 is a flapper valve and the auxiliary operator involved had little experience with valves of this design. Also, valve RHR-764 was the only valve in the checklist which would not have been previously in the correct position as called for by OP-38A. This fact in conjunction with the previously mentioned factors led the auxiliary operator to mistakenly identify valve RHR-764 to be in the locked closed position as called for in the lineup when it was actually locked open. CP&L believes that this event is an isolated case of operator error and is not representative of a generic condition.

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

Both the checklist in OP-38A and Plant General Procedure (GP-6) have been revised to insure that valve RHR-764 is repositioned properly in preparation for placing the Residual Heat Removal System in service through the use of action statements. GP-6 requires OP-38A to be per-

formed as the initial RHR lineup. OP-38A checks that RHR-764 is locked open. GP-6 now states, later in the procedure, "close RHR-764" as an action statement.

The auxiliary operator involved was counselled regarding the seriousness of improper performance of valve lineups. The room lighting has been restored.

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

The circumstances surrounding this occurrence and the procedure revisions implemented will be reviewed by all Unit No. 2 Operations personnel.

5. Date When Full Compliance Will Be Achieved

The circumstances surrounding this occurrence and appropriate procedure revisions will be reviewed by Unit No. 2 Operations personnel by February 28, 1982.

Very truly yours,

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

CLW/tm

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:
5-28-86

Lillian M. Stokes
Notary (Seal)