



2. Reason for the Violation

Neither the modification nor the maintenance instruction, used to replace the valve internals, specified a spring tension setting. Consequently, the personnel did not have sufficient guidance which led to an erroneous conclusion that the spring tension could be reduced to ensure the stroke time required by the inservice inspection program would be met.

3. Corrective Steps Which Have Been Taken And Results Achieved

The spring tension setting was returned to the manufacturer's design parameter for normal plant operational conditions, and appropriate personnel have been advised of the effect of changing the spring tension on these and similar valves.

4. Corrective Steps Which Will be Taken to Avoid Further Violation

Maintenance Instructions for the pressurizer PORVs will be revised to include spring tension requirements prior to further maintenance on the valves. Maintenance Instructions on similar valves will be reviewed to ensure spring tension requirements are included.

5. Date When Full Compliance Will Be Achieved

Based on the advice provided to appropriate plant personnel and the fact that the spring tensions have been readjusted, we are in compliance at the present time; however, the PORV Maintenance Instructions will be revised prior to use, or no later than August 31, 1982. The review of Maintenance Instructions for similar valves will be completed and the necessary revisions implemented by November 30, 1982.

B. Severity Level IV Violation (IER-81-36-02)

Technical Specification 6.8.1 requires that procedures be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A to Regulatory Guide 1.33 dated November 3, 1972.

Contrary to the above, as of November 30, 1981, plant procedures AP-19 and OP-30 described the automatic operation of the PORVs to reduce reactor pressure and provided instruction for control of pressure transients that were either invalid or could contribute to an event when the block valves were closed. Automatic operation had been negated for nearly four years prior to November 30, 1981, because the block valves were closed to prevent known PORV leakage. The lack of formal procedures or administrative guidance contributed to the partial depressurization event on November 30, 1981.

CP&L Response

1. Admission or Denial of the Alleged Violation

Carolina Power & Light Company acknowledges the violation.

2. Reason for the Violation

The pressurizer PORV block valves were closed because it was known that these PORVs leaked by their seats. To ensure the operators were aware of the status of the PORVs and block valves and because their status was other than normally expected, the operator was instructed to enter into his log book, at the beginning of each shift, that the PORV block valves were shut because the PORVs were leaking. Although this log entry ensured the operators were cognizant at all times of the condition and status of the PORV and block valves, it did not provide operational guidance to the operators as the necessity for operational guidance on these valves was not recognized.

3. Corrective Steps Which Have Been Taken and Results Achieved

As discussed in Inspection Report No. 81-32, Standing Order No. 17 was implemented to provide guidance on the use of the PORV block valves.

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

Compliance with Standing Order No. 17 should prevent further violation.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved with the approval of Standing Order No. 17.

C. Severity Level IV Violation (IER-81-36-03)

Technical Specification 6.5.1.7.f requires that the PNSC review facility operations to detect potential safety hazards. FSAR, Section II describes operation of the gas analyzer to prevent explosive mixtures of hydrogen and oxygen in tanks containing radioactive gases. Plant procedures require operators to take corrective actions to prevent explosive mixtures based on gas analyzer sample analyses on these tanks.

Contrary to the above, during the period December 12, 1980 through November 20, 1981, the gas analyzer was consistently inoperative, and compensatory gas samples were not being taken. A PNSC review to identify and correct the potential safety hazard associated with this condition was not performed.

CP&L Response

1. Admission or Denial of the Alleged Violation

Carolina Power & Light Company acknowledges the violation.

2. Reason for the Violation

Operational and maintenance controls are the primary means by which appropriate combinations of hydrogen and oxygen concentrations are maintained throughout the plant, but the gas analyzer samples various tanks to ensure that controls are and have been effective. The gas analyzer experienced a period of frequent breakdowns which resulted in its unreliability.

3. Corrective Steps Which Have Been Taken And Results Achieved

An in-depth study of the gas analyzer was made. Although the analyzer itself was found to operate properly, there were various problems with support equipment. These problems were corrected and improved instructions were provided for those operating the gas analyzer to ensure its continued operation and to provide guidance for future troubleshooting.

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

A PNSC Action Item has been created to monitor the gas analyzer status and performance. This ensures that gas analyzer performance is reviewed during each Regular Monthly PNSC Meeting until its performance is satisfactory.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the operability of the gas analyzer and the establishment of a PNSC Action Item to follow-up on its continued operation.

If you have any questions concerning this response, please contact our staff.

Yours very truly,



P. W. Howe
Vice President
Technical Services

CLW/DCW/bwb (4316)

cc: Mr. W. J. Ross

P. W. Howe 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: 10/4/86

Franklin Murray
Notary (Seal)

