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United States Nuclear Regulatory Commission
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NRC INSPECTION REPORT NO. 50-261/90-11 REPLY TO NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation identified by NRC Inspection Report No. 50-261/90-11.

Severity Level IV Violation (RII-90-11-01-SI4)

10 CFR 50 Appendix B Criterion XVI requires measures to be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. TS 6.5.1.1.1.c requires procedures to be established for surveillance testing. Technical Specification Table 4.1-1, Item 27, requires monthly testing of the power range high flux - low setpoint reactor trip and two-out-of-three loop low flow reactor trip logic channels.

Contrary to the above, adequate measures were not established to assure that corrective action was taken to preclude repetition in that on March 2, 1990, site personnel identified that procedures implementing monthly logic testing of power range high flux - low setpoint reactor trip and two-out-of-three loop low flow reactor trip logic channels were not adequately established and consequently these logic channels were not completely tested monthly. This is a repetitive problem, in that, on June 23, 1988, a Notice of Violation was issued for written procedures not being adequately established to perform testing of the turbine redundant overspeed trip system as required by Technical Specification Table 4.1-1, Item 28.

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Reply

1. Admission or Denial of the Violation

CP&L acknowledges the violation.

2. Reason for the Violation

With regard to the specific failure to perform monthly logic channel testing of the power range high flux trip - low setpoint and the two-of-three loop low flow setpoint, two factors have been identified which resulted in this occurrence.

First, the design of the plant equipment originally installed for the testing of reactor protection system (RPS) logic channels did not consider testing of these logic channels. This equipment can be used to perform functional tests of these logic channels, however, the required testing sequence is atypical of the testing method for RPS logic channels associated with normal, full power RPS features. In summary, the design of originally installed testing hardware contributed to the failure to previously identify monthly testing of the RPS features as a Technical Specification requirement.

Second, Technical Specification Table 4.1-1, Item 27, is not explicit and was subject to misinterpretation. Specifically, the power range high flux trip - low setpoint is blocked when reactor power is above 10%. Similarly, the two-of-three loop low flow setpoint is only applicable when reactor power is above 10%, but less than 40%. Since these features are not applicable during steady-state, full power operation, it was not previously recognized that monthly testing was required. In summary, the limited applicability of these RPS features contributed to the failure to recognize that monthly testing of these features was required even during steady-state, full power operation.

With regard to the repetitive nature of this violation, the contributing factors identified above are believed to be the primary reasons why this surveillance requirement was not identified by previous reviews of the Technical Specifications. As stated within Inspection Report No. 90-11, an independent review of Technical Specification surveillances was performed in 1982. Also, as described in responses to Inspection Report No. 88-10 dated July 20, 1988, September 15, 1988, and January 31, 1989, a complete review of the Technical Specifications was performed to identify surveillance requirements and their implementing procedures to insure that deficiencies did not exist. This review identified thirteen (13) discrepancies, but did not identify the monthly testing requirement for the RPS logic channels addressed in this violation. As stated above, the design of originally installed hardware and the limited applicability of these features resulted in the failure to identify these surveillance requirements during previous reviews of the Technical Specifications.

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

Since the power range high flux trip - low setpoint and two-of-three loop low flow setpoint are credited for mitigation of analyzed events (Updated Final Safety Analysis Report, Chapter 15), actions were taken to promptly address testing of these features. Temporary procedure changes were implemented on March 13, 1990, which incorporated monthly testing of these features into existing at-power test procedures. These revised procedures were used to successfully test affected Train "A" logic channels on March 14, 1990, with successfully testing of affected Train "B" logic channels being completed on March 15, 1990. These temporary procedure changes were implemented as permanent procedure revisions on April 3, 1990.

Although not identified within the Notice of Violation, the cover letter transmitting Inspection Report No. 90-11 discussed logic channel testing of the source range high flux trip and the intermediate range high flux trip. Further review of the Technical Specifications and the plant specific hardware configuration indicate that testing of the source range high flux trip logic is only appropriate prior to reactor startup. To address this situation, a license amendment and an associated Temporary Waiver of Compliance were requested and have been issued to clarify Item 27 of Technical Specification Table 4.1-1.

Logic channel testing of the intermediate range high flux trip will be performed monthly, unless periods of reactor cold shutdown extend the interval beyond one month, in which case testing will be performed prior to reactor startup. Permanent procedure revisions to incorporate this testing were completed and implemented on June 15, 1990.

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

As stated within the corrective steps which have been taken and the results achieved, procedure changes have been implemented to address monthly testing of the affected RPS logic channels.

Procedure revision(s) will be prepared and implemented which will ensure logic channel testing of the source range high flux trip prior to reactor startup, if testing has not been performed in the preceding seven (7) days. Appropriate procedure revisions will be prepared and implemented by September 28, 1990.

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To help ensure that no similar issues exist with regard to Technical Specification surveillance requirements, the Plant Nuclear Safety Committee has initiated that an independent assessment be performed of the instances identified, and of the overall implementation of Technical Specification surveillance requirements. It is expected that this independent assessment, when considered with previous Technical Specification reviews, will eliminate the potential for future similar occurrences. The scope of this independent assessment and a plan and schedule for its implementation is currently under development. The NRC Resident's Office will be advised of progress made regarding this assessment.

5. Date When Full Compliance Will Be Achieved

The dates for completion of the corrective actions described above are provided with the associated corrective action description.

Should you have any questions concerning this submittal, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



C. R. Dietz
Manager

Robinson Nuclear Project Department

RDC:dwm

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO