

Central File
50-261



Carolina Power & Light Company
Raleigh, North Carolina
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Serial: NO-80-830

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE BULLETIN 80-06

Dear Mr. O'Reilly:

In response to IE Bulletin 80-06, the following information is provided relative to H. B. Robinson Unit No. 2. The following responses are numbered corresponding to the action paragraphs of the Bulletin.

1. Review the drawings for all systems serving safety-related functions at the schematic level to determine whether or not upon the reset of an ESF actuation signal, all associated safety-related equipment remains in its emergency mode.

Response:

A review of control wiring diagrams of all safety-related functions was made. This review again confirmed that all emergency equipment would remain in the emergency mode upon reset. There are some containment isolation valves that are in closed systems such as the gas analyzer and the Containment Radiation Monitoring System Channels 11/12 which do return to their normal service when Containment Isolation Phase A is reset. However, as a part of the TMI followup, modifications are being prepared to change this design.

2. Verify the actual installed instrumentation and controls at the facility are consistent with the schematics reviewed in Item 1 above by conducting a test to demonstrate that all equipment remains in its emergency mode upon removal of the actuating signal and/or manual resetting of the various isolating or actuation signals. Provide a schedule for the performance of the testing in your response to this Bulletin.

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Response:

Periodic Tests CPL-PT-2.1 and CPL-PT-23.2 are conducted on a refueling interval and have the purpose of confirming the operation of needed emergency equipment under the simulated conditions of Loss of Power and Safety Injection. Although not presently specifically addressed, when resetting the Safety Signals, if any safety equipment had changed status, it would have been noted during the many times this test has been conducted previously, since that would be contrary to certain steps of the test procedure. Stopping the pumps and containment HVH units is addressed after the actuation signal is reset.

Periodic Test No. CPL-PT-3.1 is also conducted on a refueling interval and has the purpose of confirming the operation of the Containment Spray System and it does verify that all equipment stays in the emergency mode after the actuation signal is reset.

These tests will be conducted during the 1980 Refueling Outage. It will be verified that all required equipment remains in the position associated with the emergency mode after the actuation signals have been reset. A specific step will be added to the test procedures to verify all necessary equipment remains in the emergency mode as required.

3. If any safety-related equipment does not remain in its emergency mode upon reset of an ESF signal at your facility, describe proposed system modification, design change, or other corrective action planned to resolve the problem.

Response:

Tests will be performed to verify design conditions as indicated on the drawings. Any safety-related equipment not remaining in its emergency mode upon reset of its actuation signal will be modified or other corrective action as appropriate will be taken before returning to power after refueling. As stated in response to Item 1, several valves by design are known to resume normal position after the actuation signal is reset and the modifications to change this are part of this commitment. The modifications will consist of installing electrical seal-in circuits to prevent the equipment from resuming normal operations upon loss of the Safety Injection Signal.

4. Report in writing within 90 days the results of your review and include a list of all devices which respond as discussed in Item 3 above, actions taken or planned to assure adequate equipment control, and a schedule for implementation of corrective action.

Response:

The known devices which respond as discussed in Item 3 above are:

1. Valves which supply an air sample to the containment radiation monitoring system and return the sample to containment.
2. Valves which supply a sample to the gas analyzer from the pressurizer relief tank.
3. Valves which supply a sample to the gas analyzer from the reactor coolant drain tank.
4. Valves which supply instrument air to the containment.
5. Valves for Steam Generator Blowdown.
6. Valves for Steam Generator Blowdown Sampling.

Modifications to these devices are being planned for implementation during the 1980 Refueling Outage as required by NUREG 0578.

The actions as indicated above are adequate to respond to the concerns of the Bulletin. If testing during the refueling outage identifies any other equipment which does not remain in its emergency mode after resetting the actuation signal, an amended response will be submitted. Results of all testing and the modifications will be available at the plant for review by members of your staff.

Very truly yours,

B. J. Furr by J. W. Curry
B. J. Furr

Vice President

Nuclear Operations Department

RMS:CSB:bkm*

cc: Mr. N. C. Moseley

Sworn to and subscribed before me this 12 day of June, 1980.

Margaret L. Sparks
Notary Public

My commission expires June 5, 1984.