

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8010270383 DOC.DATE: 80/10/22 NOTARIZED: NO DOCKET #
 FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH.NAME AUTHOR AFFILIATION
 STARKEY,R.B. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Region 2, Atlanta, Office of the Director

SUBJECT: LER 80-023/03L-0:on 800923,charcoal cells in control room
 ventilation sys were found w/low charcoal levels.Caused by
 improper loading procedures.Written procedures for filling
 cells are being developed.

DISTRIBUTION CODE: A002S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 1+2
 TITLE: Incident Reports

NOTES:

ACTION:	RECIPIENT	COPIES	LTTR	ENCL	RECIPIENT	COPIES	LTTR	ENCL
	ID CODE/NAME				ID CODE/NAME			
	VARGA,S. 04	3		3				
INTERNAL:	A/D COMP&STRU06	1		1	A/D ENV TECH 07	1		1
	A/D MATL & QU08	1		1	A/D OP REACT009	1		1
	A/D PLANT SYS10	1		1	A/D RAD PROT 11	1		1
	A/D SFTY ASSE12	1		1	A/D TECHNOLOG13	1		1
	ACC EVAL BR 14	1		1	AEOD	2		2
	ASLBP/J.HARD	1		1	AUX SYS BR 15	1		1
	CHEM ENG BR 16	1		1	CONT SYS BR 17	1		1
	CORE PERF BR 18	1		1	D/DIR,HUM FAC19	1		1
	DIR,ENGINEERI20	1		1	DIR,HUM FAC S21	1		1
	DIR,SYS INTEG22	1		1	EFF TR SYS BR23	1		1
	EQUIP QUAL BR25	1		1	GEOSCIENCES 26	1		1
	I&C SYS BR 29	1		1	I&E 05	2		2
	JORDAN,E./IE	1		1	LIC GUID BR 30	1		1
	LIC QUAL BR 31	1		1	MATL ENG BR 32	1		1
	MECH ENG BR 33	1		1	MPA	3		3
	NRC PDR 02	1		1	OP EX EVAL BR34	3		3
	OR ASSESS BR 35	1		1	POWER SYS BR 36	1		1
	RAD ASSESS BR39	1		1	REACT SYS BR 40	1		1
	<u>REG FILE</u> 01	1		1	REL & RISK A 41	1		1
	SFTY PROG EVA42	1		1	STRUCT ENG BR44	1		1
	SYS INTERAC 845	1		1				
EXTERNAL:	ACRS 46	16		16	LPDR 03	1		1
	NSIC 05	1		1	TERA:DOUG MAY	1		1

OCT 28 1980

CONTROL BLOCK:

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7	8			S	C	H	B	R	2	(2)	0	0	-	0	0	0	0	-	0	0	(3)	4	1	1	1	0	(4)			(5)
		LICENSEE CODE									LICENSE NUMBER										LICENSE TYPE						CAT			

REPORT SOURCE: 0 1 7 8 L 6 0 5 0 0 0 2 6 1 7 0 9 2 3 8 0 8 1 0 2 2 8 0 9
60 61 DOCKET NUMBER 68 69 EVENT DATE 74 75 REPORT DATE 80

On September 23, 1980 review of an inspection performed on the control room ventilation system (HVE-19) on August 12, 1980 revealed that due to the lack of procedures covering their filling, charcoal cells were found with low charcoal levels. With low charcoal levels the cells might not have been capable of meeting the freon leak test which would have resulted in a degraded mode permitted by Technical Specification 3.15.1.a which is reportable pursuant to 6.9.2.b (2). The reactor was in cold shutdown condition at the time.

SYSTEM CODE S G 11		CAUSE CODE D 12		CAUSE SUBCODE Z 13		COMPONENT CODE F I L T E R 14		COMP. SUBCODE Z 15		VALVE SUBCODE Z 16	
EVENT YEAR 8 0 21 22		SEQUENTIAL REPORT NO. 0 2 3 24 26		OCCURRENCE CODE 0 3 28 29		REPORT TYPE L 30		REVISION NO. 0 32			
ACTION TAKEN X 18 33		FUTURE ACTION G 19 34		EFFECT ON PLANT Z 20 35		SHUTDOWN METHOD Z 21 36		HOURS 0 0 0 0 22 37 40		ATTACHMENT SUBMITTED Y 23 41	
NPRD-4 FORM SUB. N 24 42		PRIME COMP. SUPPLIER A 25 43		COMPONENT MANUFACTURER B 0 7 5 26 44 47							

0 The low level of charcoal in the cells was apparently due to the improper loading
1 with charcoal in 1979 and subsequent settling over a period of approximately 14
2 months. The cells were removed from the system, filled with new charcoal while
3 being tapped to promote settling, and tested satisfactorily. A written procedure
4 on filling the charcoal cells is being developed to address this method of filling.

FACILITY STATUS		% POWER		OTHER STATUS		METHOD OF DISCOVERY		DISCOVERY DESCRIPTION	
5	H	0	0	0	N/A	B	Periodic Test		
ACTIVITY CONTENT		RELEASER OF RELEASE		AMOUNT OF ACTIVITY		LOCATION OF RELEASE			
1	6	Z	Z	N/A	N/A				
PERSONNEL EXPOSURES		NUMBER		TYPE		DESCRIPTION			
1	7	0	0	0	Z	N/A			
PERSONNEL INJURIES		NUMBER		DESCRIPTION					
1	8	0	0	0	N/A				
LOSS OF OR DAMAGE TO FACILITY		TYPE		DESCRIPTION					
1	9	Z	N/A						
PUBLICITY		ISSUED		DESCRIPTION		NRC USE ONLY			
2	0	N	N/A						

NRC USE ONLY

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R. B. Starkev, Jr.

(803) 383-4524

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CAUSE DESCRIPTION AND ANALYSIS:

On August 12, 1980, prior to performing the inplace leak test (CPL-PT-24.0), on the charcoal cells in the Control Room Emergency Ventilation System (HVE-19), the charcoal cells were removed from the system and inspected for fullness. This inspection was necessitated by the discovery of several cells in other systems (not required to satisfy limiting conditions for operations) which were not properly refilled when the 1980 charcoal samples were taken. However in this case, the other five cells in the system were low as well as the sampled cell. Although the system was not tested it is believed that it would have failed the freon leak test of PT-24.0. This would have resulted in a degraded mode permitted by Technical Specification 3.15.1.a which is reportable pursuant to 6.9.2.b.2. At the time of inspection, the filter system had not been in use since the 1979 refueling outage. At that time the charcoal cells were refurbished with new charcoal and tested for system integrity. The system passed with a 100% removal efficiency.

The apparent cause for the low level of charcoal in the cells was due to settling over a period of 14 months. If this system had been required for operation, the possibility exists that it would not have met its design function.

CORRECTIVE ACTION:

Immediately after discovering the problem, the cells were filled with new charcoal and tapped to promote settling while filling. The charcoal cells were reinstalled into the system and then tested for leak tightness and removal efficiency. The results of the test indicated that the system was 99.90 percent efficient.

CORRECTIVE ACTION TO PREVENT FURTHER OCCURRENCES:

At the time of the refilling, there were no written procedures covering the proper packing of charcoal in filter cells. Although this problem has not occurred before, a written procedure will be developed to address this method of filling. This procedure will be implemented prior to December 31, 1980.