Ltr to Carolina Power and Light Company
dtd 12/12/72

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DIRECTORATE OF REGULATORY OPERATIONS
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In Reply Refer To:
RO:II:RLC
50-261/72-4

DEC 12 1972

Carolina Power and Light Company
Attn: Mr. J. A. Jones
Senior Vice President
Engineering and Operating
336 Fayetteville Street
Raleigh, North Carolina 27602

Gentlemen:

Thank you for your letter dated November 30, 1972, informing us of the steps you have taken to correct the items of noncompliance concerning AEC Operating License No. DPR-23, that were brought to your attention in our letter dated November 10, 1972. We will examine this matter during our next inspection.

We appreciate your cooperation.

Very truly yours,

John G. Davis
Director

Carolina Power & Light Company

November 30, 1972

Mr. John G. Davis
Director, Region II
AEC Directorate of Regulatory Operations
230 Peachtree St., NW
Atlanta, Georgia 30303

H. B. ROBINSON UNIT NO. 2
LICENSE DPR-23
RESPONSE TO NON-COMPLIANCE REPORT

Dear Mr. Davis:

Your letter dated November 10, 1972, concerned two activities at H. B. Robinson Plant which appear to be in non-compliance with license requirements.

Item No. 1 refers to the boron injection tank concentration and temperature not meeting the requirements of our Technical Specification on specified dates.

The boron injection tank was found with low concentration at approximately 5:00 A.M., on July 16, 1972. The concentration was returned to 19,818 ppm at 9:40 P.M., on the same day. In an effort to ensure that the final concentration of boric acid did not exceed the required specifications, operating personnel were overly cautious in raising the concentration from 19,818 ppm to the desired level of 22,000 ppm. Continued efforts were made to raise the concentration above 20,000 ppm, but the overly cautious approach resulted in not getting within limits in less than 24 hours.

On July 12 through July 14, 1972, the boron injection tank temperature was indeed low for the period specified. The primary cause for the temperature being low for this period of time was Auxiliary Operator error in not properly observing the heat trace recorder and reporting the low temperature to the Shift Foreman. At the time this problem was over-shadowed by other problems which existed during this period such as low boric acid concentration for a short period, and a plugged recirculation line. As soon as the low temperature was detected, all efforts were made to raise the temperature within limits. From the time the low temperature was detected until the temperature was within limits was less than 24 hours.

Item No. 2 concerns two items not being reported within 24 hours.

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The boron injection tank was not low in boric acid concentration on July 13, 1972, in excess of 24 hours. Carolina Power & Light Company interprets the Technical Specifications as authorizing 24 hours to return the boron injection tank to normal specifications before it is considered a reportable item. The low temperature in the boron injection tank was not out of limits in excess of 24 hours from the time the problem was discovered until the temperature was returned within limits.

The following steps have been initiated to prevent recurrence of these problems:

1. All operators have been cautioned to notify their foreman of any unusual temperature deviations in the boron injection tank and the heat tracing circuits associated with the engineered safety systems.

2. A new annunciator system is being installed to increase the reliability of the alarms on the heat tracing system. It is anticipated that this plant modification will be completed by January 1, 1973.

3. With the assistance of a Westinghouse electrical engineer, knowledgeable in heat tracing, the system has been inspected and additional heat tracing circuits and insulation have been installed.

4. Operating procedures have been modified to verify boron injection tank recirculation flow at least once a day.

5. All sample points on the boric acid system have had flush lines installed to prevent plugging and to ensure that accurate, representative samples can be obtained for analysis. This modification was completed in early October, 1972.

6. The frequency of sampling of the boric acid tanks and boron injection tank has been increased to two times per week. Current Technical Specifications require a monthly sample of the BIT and a semi-weekly check of the BAT's.

7. Following any plant evolution which requires a safety injection pump to be run, an analysis is performed on the solution in the boron injection tank. This was initiated in October and will be continued to ensure that any dilution will be immediately detected.

8. A comprehensive surveillance test is being written to verify operability of the primary and secondary circuits of the heat tracing system. It is anticipated that this test will be completed and become a part of the operating procedures by December 15, 1972.

Carolina Power & Light Company is confident that the additional procedures and precautions should make the recurrence of the incident which occurred in July, 1972, highly unlikely.

Yours very truly,

E. E. Utley
Vice President
Bulk Power Supply

BJF/NBB:za

cc: Mr. C. D. Barham
Mr. N. B. Bessac
Mr. B. J. Furr
Mr. S. Grant