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SUBJECT: Responds to NRC 880808 ltr re violations noted in Insp Rept
 50-261/88-10.Corrective actions:

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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INSPECTION REPORT 50-261/88-10-01 Supplemental Response

Gentlemen:

Carolina Power and Light Company (CP&L) provides this supplement to our July 20, 1988 response to the alleged violation in the USNRC Inspection Report 88-10. As requested in your letter of August 8, 1988, this supplement provides the results of our review of other events to determine if they indicate programmatic inadequacies in Technical Specification related surveillance procedures. The revisions to the original response are indicated by a right hand margin bar.

Alleged Severity Level V Violation RII-88-10-02-SL5

Technical Specification 6.5.1.1.1.a requires written procedures be established for procedures in Appendix A of Regulatory Guide 1.33 Revision 2, February 1978. Item 8.6 of Appendix A requires procedures for each surveillance test listed in Technical Specifications. Item 28 of Technical Specification Table 4.1-1 requires testing of the Turbine Redundant Over Speed Trip System (TROTS).

Contrary to the above, written procedures were not adequately established in that MST-552 Revision 3, which implements Item 28 of Technical Specification Table 4.1-1, does not contain instructions to fully test TROTS. Specifically, testing of the turbine stop, control, reheat and intercept valve solenoids were not provided for in the test procedure.

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Reply

1. Admission or denial of the alleged violation.

CP&L acknowledges the alleged violation with one exception. Upon further review of the TROTS Manufacturer's Technical Manual, and telephone conversations with the vendor, the testing of all 28 solenoids while at power is not recommended and was never intended. Design testing capability of the TROTS at power included only the high pressure turbine stop and governor valves. The Plant Nuclear Safety Committee (PNSC) has reviewed the issue and concluded that testing the stop and governor valve solenoids associated with TROTS at power be performed at monthly intervals, and the reheat and intercept solenoids be tested off-line at refueling intervals. This meets the intent of the Technical Specification Testing Requirement, Item 28, Table 4.1-1.

2. Reason for the violation if admitted.

The TROTS logic is tested on a monthly basis and the speed channels are calibrated on a refueling basis. The actuation of the solenoids were never included in the surveillance procedure due to a misinterpretation of the Technical Specification functional testing requirement. Documentation of the 1970 change to the Plant Technical Specifications which incorporated TROTS requirements into Table 4.1-1, "Minimum Frequencies for Checks, Calibrations, and Test of Instrument Channels" is not conclusive enough to determine precisely why the Solenoid Testing Requirements were misinterpreted. An independent review of surveillance tests conducted during 1982 did not identify this testing inadequacy due to the backfit nature of the system and the unavailability of detailed background and design information. For this reason, we believe the TROTS test inadequacy to be an isolated instance with respect to functional surveillance activities (those activities designed to routinely verify functional operability of equipment as required by Technical Specifications).

3. Corrective steps which have been taken and results achieved.

The TROTS system is currently being evaluated to determine if the system is required. A Special Procedure was developed to test the solenoids. The Plant was shutdown on June 19, 1988, and this test was performed satisfactorily. The 28 solenoids previously scheduled for monthly testing have been re-evaluated by Westinghouse and CP&L and it was concluded that only the 12 solenoids that are associated with the stop and governor valves should be tested at power. A permanent test procedure was developed and the solenoids associated with the stop and governor valves were tested satisfactorily July 16, 1988. In addition, a permanent procedure has been developed to test the reheat and intercept valve solenoids at refueling intervals consistent with vendor recommendations.

Although the TROTS test inadequacy is viewed as an isolated incident with respect to routine functional surveillance activities, a review was conducted of four other TS Surveillance related deficiencies which occurred in the period since 1986 and collectively indicate a potential program inadequacy. These events, documented on Nonconformance Reports (NCRs), were being evaluated separately at the time the original response to this violation was submitted. Accordingly, corrective action in the original report did not consider this information. As a result of this review, the NCRs were determined to involve Technical Specification surveillance requirements that were "event" or "process" initiated as opposed to a routine functional verification. Additionally neither the NCRs nor the recent review for any of the four events revealed that a surveillance was not performed but that procedures had not been established to provide the objective evidence by way of documentation that the action had been performed. For example, TS Table 4.19-1, Item 4b, requires a daily channel check of each monitor tank level indicator during liquid additions to the tank (a process). Although the operating practice is that tanks are not filled without level monitoring, the operating procedure used for this process did not require documenting this action as a channel check.

Another NCR, related to TS Table 4.1-1 Items 9 and 10, identified a deficiency in that no written procedure adequately documented operator checks of the Control Rod Analog and Step Counter Bank position following rod motion of greater than 6 inches when the plant computer is out of service (an event). Although it is believed that the intent of the Technical Specification was met, i.e., operators routinely monitor rod position indicators, procedures did not require the objective evidence of the actions.

The procedural deficiencies in each case have been corrected. However, collectively they indicate a need to review similar types surveillance requirements (event/process driven) and their implementing procedure to insure other deficiencies do not exist.

4. Corrective steps which will be taken to prevent repetition of the violation.

A permanent at-power surveillance test procedure has been developed and included in MST-552 to test the solenoids associated with the governor and stop valves on a monthly basis. The reheat and intercept valve solenoids for the TROTS will be tested at refueling intervals (MST-554).

A review of all "event/process initiated" TS surveillance requirements will be conducted to ensure procedures exist that provide objective evidence that requirements are met.

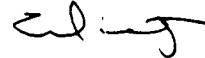
5. Date when full compliance will be achieved.

Full compliance regarding the TROT's MST was achieved with the action taken above.

The additional review of "event/process initiated" Technical Specifications and implementing procedures will be completed by December 31, 1988. Discrepancies found and not corrected by this date will be reported in a special response by January 31, 1989, if required.

If you have any questions regarding this matter please contact me.

Very truly yours,



Charles R. Dietz
Manager
Robinson Nuclear Project Department

FLL:jch

cc: Dr. J. N. Grace
Mr. L. W. Garner
INPO