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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
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NRC INSPECTION REPORT NO. 50-261/89-09
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation initiated by Inspection Report No. 50-261/89-09.

Severity Level IV Violation (RII-89-09-01-SL4)

Technical Specification 6.5.1.1.1.a requires written procedures be established for the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978. Item 3.d. of Appendix A requires procedures for changing modes of operation be prepared for the Emergency Core Cooling Systems (ECCS). EPP-10, Transfer to Hot Leg Recirculation, establishes the procedures for changing modes of ECCS operation.

Contrary to the above, written procedures were not adequately established for changing modes of operation of the ECCS, in that, EPP-10, Revision 2, does not provide steps to prevent safety injection (SI) pump runout with one SI pump operating.

REPLY

(1) Admission or Denial of the Violation

CP&L acknowledges the violation.

(2) The Reason for the Violation

The violation is attributed to an oversite during previous revisions to Emergency Operating Procedures for single SI Pump operation.

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(3) The Corrective Steps Which Have Been Taken and the Results Achieved

When the potential for SI Pump runout was initially questioned, applicable procedures were reviewed. Abnormal Operating Procedure AOP-020 was identified to be in error, and was revised to incorporate limitations concerning SI Pump operation. A further review of Emergency Operating Procedures identified that EPP-10 was also in error, and it too was immediately corrected. No other procedures have been found to be in error.

(4) The Corrective Steps Which Will Be Taken to Avoid Further Violations

In order to prevent further violations of this nature, the Validation and Verification process for the EOP's will be expanded to ensure a more broader-based, multi-disciplined review of procedures is conducted.

(5) The Date When Full Compliance Will Be Achieved

Full compliance for the violation was achieved with the procedure revisions mentioned above. Enhancements to the Validation and Verification program will be complete during November, 1989.

Severity Level IV Violation (RII-89-09-05-SL4)

10 CFR 50 Appendix B, Criterion III, as implemented by Section 17.2.3 of the Updated Final Safety Analysis Report, requires measures be established to ensure design bases are correctly translated into specifications, drawings, and procedures. The design basis of the residual heat removal (RHR) system, as defined in Westinghouse Corporation Atomic Power analysis WCAP-12070, specifies, in part, that a 50 gpm leak into the RHR pit be isolable.

Contrary to the above, in April 1989, it was identified that at the time NUREG-0737 Item II.B.2 was implemented (December 1980), measures were inadequate to ensure that the above RHR design basis was translated into specifications, drawings, and procedures. Specifically, postulated radiation dose levels assumed in Item II.B.2 are greater than those anticipated during original plant design. As a result, manual valves originally designated for isolation of leakage into the RHR pit are no longer considered accessible.

REPLY

(1) Admission or Denial of the Violation

CP&L acknowledges the violation.

(2) The Reason for the Violation

The cause of the violation is the previous lack of a comprehensive Design Basis Document for the SI system and the resulting failure to recognize the impact of subsequent requirements (NUREG 0737, Item II.B.2) on the design basis, and procedurally implement the required actions.

(3) The Corrective Steps Which Have Been Taken and the Results Achieved

Upon discovery of the potential for losing both RHR (Low Head Safety Injection) cooling loops during post LOCA long term recirculation, compensatory actions were immediately taken for the perceived problem. The plant was shutdown at the time, and start-up was delayed until compensatory actions could be taken. A Justification for Continued Operation of the plant was prepared by assessing the existing sources of water to the RHR pump pit and demonstrating the adequacy of short term corrective actions. A mechanical level detection device was made available to each of the RHR pump bays which indicates water level in each bay outside the pit in a low dosage area. This device is staged next to the RHR pit and is installed post event but prior to the initiation of recirculation. This will provide a reliable means of determining significant leakage in the RHR pit and give Operations personnel time to take appropriate actions. Emergency Operations procedures were revised to specify the actions necessary to maintain Post LOCA RHR Cooling.

(4) The Corrective Steps Which Will Be Taken to Avoid Further Violations

A project has been ongoing to review and resolve the issue. Work completed to date indicates that the DBD may need to be revised. Specifically, the Design Basis Document for the normal functions of the RHR system are being prepared. For this reason the scope of the hardware upgrades needed are not yet known. CP&L plans to pursue this issue with the objective to remove the burden of the additional operator actions. Permanent corrective action to satisfy the design basis are currently being reviewed. Any necessary hardware changes are currently planned to be implemented during the 1990 Refueling Outage.

The DBD Reconstitution Project has been initiated voluntarily by CP&L to reconstitute the design basis of safety related systems. Details of the project have been the subject of presentations in both Region II and NRR Offices. Future Design Basis documents will address the dose study required by NUREG 0737, Item II.B.2, as applicable. However, it is emphasized that the DBD reconstitution effort was designed to find design basis problems, and it is anticipated that such problems will surface as the effort progresses. CP&L does not consider such additional problems to be repeat violations.

(5) The Date When Full Compliance Will Be Achieved

The Low Head Safety Injection functions of the RHR System are currently planned to be in compliance with its Safety Injection System design basis prior to start-up from the 1990 Refueling Outage, pending finalization of design and availability of materials.

Very truly yours,

C. R. Dietz
Manager
Robinson Nuclear Project Department

RDC:dwm

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