



Carolina Power & Light Company

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ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

DEC 21 1984

Robinson File No: 13510E

Serial: RSEP/84-1167

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NO. 50-261
LICENSE NO. DPR-23 A
IE INSPECTION REPORT IER-84-26 REV. 1

Dear Mr. O'Reilly:

Following discussions with members of your staff regarding Carolina Power and Light Company's (CP&L) original response dated September 14, 1984, to the subject inspection report, the following supplemental response is provided.

Severity Level IV Violation (IER-84-26-02-SL4)

10CFR50, Appendix B, Criterion II, as implemented by Section 1 of the Licensee's Corporate Quality Assurance Program, requires that activities affecting the quality of safety-related systems and components be accomplished under suitably controlled conditions.

Contrary to the above, as of July 21, 1984, suitable controls were not established during removal of containment sump debris screens in that protective measures were not established to prevent entry of foreign material into the suction piping of both residual heat removal pumps.

Supplemental Response:

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

The Plant was in a Steam Generator Replacement Outage (SGRO) with the fuel removed to the spent fuel pit. Contractors performing piping inspections in containment requested their CP&L Plant contact remove screens so they could have access to piping. These screens were the RHR containment floor debris screens. These screens are unique in that they protect an opening to a safety-related system. When the screens are removed, it is necessary to control their opening to ensure foreign objects do not enter the piping. Once the screens are replaced, there is not a functional test to ensure that foreign objects have not entered the piping.

During the SGRO, there were two Mechanical Maintenance Groups on site. One was the CP&L Plant Maintenance Staff which uses a "Work Request" system to control their work. The other was the CP&L Construction Staff whose work was authorized and controlled through the use of "Construction Work Packages."

This event occurred because a CP&L Plant Staff person, misunderstanding which screens were to be removed, circumvented the Work Request System and requested CP&L Construction to remove the screens.

CP&L Construction thought these screens were within the authorized work limits of their Steam Generator Construction Work Package. This Construction work package, which authorized the replacement of the Steam Generators, involved work throughout containment. The CP&L Construction person, not recognizing the significance of these screens, treated them as he did other screens in containment which were under the purview of the Construction work package. The CP&L Construction person, therefore, authorized his men to remove the subject screens. If he had recognized their significance, he would have directed the request to remove them back to the Plant staff.

If the Plant's "Work Request System" and cleanliness control procedures had been used, the removal of these screens would have been controlled.

3. Additional Event Description

While preparing this supplemental response, another event involving the RHR containment floor debris screens being removed without authorization was discovered. Following completion of the corrective actions on the original event, the Plant was heated up to full temperature and pressure and then cooled down to less than 200°F to repair service water piping. During this shutdown, one of the screens was found pulled loose. An investigation into this incident could not identify who loosened this one screen.

4. Corrective Steps Which Have Been Taken

The original event, Item 2 above, has been discussed with both the CP&L Plant person responsible for the contract piping inspections and the CP&L Construction person responsible for the Construction workers who removed the screens. Both understand that these screens are part of a safety-related system that was not included on the Steam Generator Construction Work Package, and therefore, required the controls of the Plant Work Request System.

The piping between the containment and the RHR pit outside containment, two lines, have had a mesh screen passed through them to clean any foreign material which may have entered this piping while the screens were removed and the screens were replaced. Two small wires, approximately 8" in length, were removed from the piping. The evaluation conducted indicated that these would not have affected pump operation.

Following the second event, the area around these screens was temporarily posted as "no access without the Shift Foreman's permission." Subsequently, the area behind all the sump screens was thoroughly cleaned. During this cleaning, a metal file and two 1 to 2 inch long metal straps were found. These metal pieces were not in the RHR suction pipe. No foreign material was found in the RHR suction piping. In addition, the bolts holding the screens in place have been tack welded to prevent them from being removed with just a wrench. After tack welding the bolts, the temporary posting was removed.

5. Corrective Steps Which Will Be Taken

A permanent sign will be erected near these screens to require that the Shift Foreman be notified prior to removing the screens. It is believed that these extensive measures are necessary to ensure that these screens are not removed without first establishing appropriate controls.

6. Date When Full Compliance Will Be Achieved

Full compliance will be achieved upon installation of the permanent sign by January 15, 1985.

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If you have any questions concerning this response, please contact Mr. David C. Stadler of my staff at (803) 383-4524, Extension 363.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'R. E. Morgan', with a long horizontal flourish extending to the right.

R. E. Morgan
General Manager
H. B. Robinson S. E. Plant

CLW/tk