

AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: 5930

FILE: *A/D*

| | | | | | | | | | | |
|--|-----------------------|------------------|-------------------------------|--|-----------------------------|--------------|--|------------|------------|--------------|
| FROM: Carolina Power & Light Company Raleigh, N.C. 27602 Mr. N.B. Bessac | | | DATE OF DOC 6-21-74 | | DATE REC'D 7-1-74 | | LTR X | TWX | RPT | OTHER |
| TO: J.F. O'Leary | | | ORIG 3 signed | | CC | OTHER | SENT AEC PDR XXX SENT LOCAL PDR XXX | | | |
| CLASS | UNCLASS XXX | PROP INFO | INPUT | | NO CYS REC'D 40 | | DOCKET NO: 50-261 | | | |

DESCRIPTION:
Ltr reporting an abnormal occurrence at the
H.B. Robinson facility concerning.....
the Diesel Generator loading test.....

ENCLOSURES:

ACKNOWLEDGED

DO NOT REMOVE

PLANT NAME: H.B. Robinson

FOR ACTION/INFORMATION 7-1-74 JB

| | | | |
|------------|---------------|----------------|----------------|
| BUTLER (L) | SCHWENCER (L) | ZIEMANN (L) | REGAN (E) |
| W/ CYS | W/ CYS | W/ CYS | W/ CYS |
| CLARK (L) | STOLZ (L) | DICKER (E) | ✓ <i>Leary</i> |
| W/ CYS | W/ CYS | W/ CYS | W/ 7 CYS |
| W/ CYS | VASSALLO (L) | KNIGHTON (E) | |
| W/ CYS | W/ CYS | W/ CYS | W/ CYS |
| KNIEL (L) | PURPLE (L) | YOUNGBLOOD (E) | |
| W/ CYS | W/ CYS | W/ CYS | W/ CYS |

INTERNAL DISTRIBUTION

| | | | | |
|---------------------|----------------------|---------------|-----------------|-------------------|
| ✓ <u>REG FILE</u> | ✓ <u>TECH REVIEW</u> | DENTON | <u>LIC ASST</u> | <u>A/T IND</u> |
| ✓ AEC PDR | ✓ HENDRIE | GRIMES | DIGGS (L) | BRAITMAN |
| ✓ OGC | ✓ SCHROEDER | GAMMILL | GEARIN (L) | SALTZMAN |
| ✓ MUNTZING/STAFF | ✓ MACCARY | KASTNER | GOULBOURNE (L) | B. HURT |
| ✓ CASE | ✓ KNIGHT | BALLARD | KREUTZER (E) | |
| GIAMBUSSO | ✓ PAWLICKI | SPANGLER | LEE (L) | <u>PLANS</u> |
| BOYD | ✓ SHAO | | MAIGRET (L) | MCDONALD |
| MOORE (L)(LWR-2) | ✓ STELLO | <u>ENVIRO</u> | REED (E) | CHAPMAN |
| DEYOUNG (L)(LWR-1) | ✓ HOUSTON | MULLER | SERVICE (L) | DUBE w/input |
| SKOVHOLT (L) | ✓ NOVAK | DICKER | SHEPPARD (L) | E. COUPE |
| ✓ GOLLER (L) | ✓ ROSS | KNIGHTON | SLATER (E) | |
| P. COLLINS | ✓ IPPOLITO | YOUNGBLOOD | SMITH (L) | ✓ D. THOMPSON (2) |
| DENISE | ✓ TEDESCO | REGAN | ✓ TEETS (L) | ✓ KLECKER |
| ✓ <u>REG OPR</u> | ✓ LONG | PROJECT MGR | WILLIAMS (E) | ✓ EISENHUT |
| ✓ FILE & REGION (3) | ✓ LAINAS | | WILSON (L) | |
| ✓ MORRIS | ✓ BENAROYA | HARLESS | | |
| ✓ STEELE | ✓ VOLLMER | | | |

EXTERNAL DISTRIBUTION

| | | |
|---|-------------------------------|------------------------|
| ✓ 1 - LOCAL PDR <i>Hartsville, S.C.</i> | (1)(2)(10) - NATIONAL LABS | 1-PDR-SAN/LA/NY |
| ✓ 1 - TIC (ABERNATHY) | 1-ASLBP(E/W Bldg, Rm 529) | 1-BROOKHAVEN NAT LAB |
| ✓ 1 - NSIC (BUCHANAN) | 1-W. PENNINGTON, Rm E-201 GT | 1-G. ULRIKSON, ORNL |
| 1 - ASLB | 1-B&M SWINEBROAD, Rm E-201 GT | 1-AGMED (RUTH GUSSMAN) |
| 1 - P. R. DAVIS | 1-CONSULTANTS | Rm B-127 GT |
| ✓ 16 - ACRS SENT TO LIC ASST Teets | NEWARK/BLUME/AGBABIAN | 1-RD..MUELLER, Rm F-3 |
| 7-1-74 | | GT |



Carolina Power & Light Company

June 21, 1974

File: NG-3513 and NG-3514

Serial: NG-74-758

Mr. John F. O'Leary, Director
Directorate of Licensing
Office of Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

50-261



Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
Region II, Suite 818
230 Peachtree Street, N.W.
Atlanta, Georgia 30303

Dear Sirs:

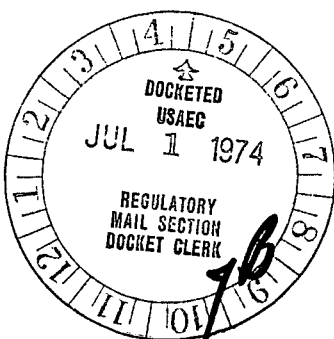
H. B. ROBINSON UNIT NO. 2
LICENSE DPR-23
DIESEL GENERATOR LOADING TEST

This is to report an unusual event which occurred at the H. B. Robinson Unit No. 2 on May 7, 1974. During the diesel generator refueling frequency surveillance test required by Technical Specification 4.6.1.2, diesel generator "A" started and loaded in 52 seconds. The Technical Specification required time for this test is 50 seconds.

The trouble was determined to be a slight amount of rust within the diesel governor's servo-booster which slowed the governor response. The servo-booster was disassembled, cleaned and reinstalled. Subsequently, the surveillance test was re-run with satisfactory results.

Corrective action taken is as follows:

1. The "B" diesel generator governor was inspected and found to be in a satisfactory condition.
2. Inspection of the governor for this type of problem will be performed at subsequent refueling outages.
3. Installation of an air dryer in the diesel instrument air system to reduce entrained moisture will be evaluated.



5900

The following discussion on the reportability of this event is included to explain our determination since it is our understanding that Regulatory Operations considers the event to be an abnormal occurrence.

Following the event the PNSC discussed whether it should be reported as an abnormal occurrence. It was determined that the event did not classify as an abnormal occurrence due to the fact that the reactor was not critical. The plant was in a cold shutdown condition with refueling boron concentration. Technical Specification Section 3.7.1 requires that the diesels be operable when the reactor is critical. If the reactor had been critical at the time, the event would have been classified and reported as an abnormal occurrence. Another factor which entered into the determination of reportability of this event is the fact that the 50 second starting and loading time specified in Technical Specification Section 4.6.1.2 is not intended as a limiting condition for operation independent of the operability requirements in Section 3.7.1. The 50 second requirement must be met for the diesel to be declared operable, but the diesel is required to be operable only during the time the reactor is critical. Therefore, the event does not classify as an abnormal occurrence.

It was also considered that this event did not classify as an unusual event since an unusual event is defined as "any substantial variance from performance specifications contained in the Technical Specifications or in the Safety Analysis Report." Carolina Power & Light Company believes that the two second deviation is not a substantial variance from expected performance. This position is supported by Westinghouse Safety Analysis engineers who conclude that this event is well within the margin of conservatism included in the safety analysis. In order, however, to avoid a full engineering analysis and evaluation of the significance of the two second deviation, the event is being reported as an unusual event.

This report was not submitted within the thirty day reporting requirement of an unusual event because our intention prior to discussion of the event with a member of the Regulatory Operations staff during a recent inspection was to report the item in the Technical Specification required six-month Operating Report.

Mr. O'Leary and Mr. Moseley

- 3 -

June 21, 1974

We wish to express a sincere concern for declaration of events as abnormal occurrences when significant nuclear safety matters are not involved. We encourage the AEC to review its definition of abnormal occurrences and the manner in which abnormal occurrences are now publicized. Declaration of this type of event as an abnormal occurrence, which to the public becomes a minor nuclear accident, can only create undue and unwarranted negative concern for safety in the nuclear industry.

Yours very truly,



N. B. Bessac

Manager

Nuclear Generation

BJF:mvp

cc: Messrs. T. E. Bowman
B. J. Furr
W. E. Graham
D. V. Menscer
E. E. Utley
D. B. Waters
R. A. Watson