

USNRC REGION II  
ATLANTA, GEORGIA

**CP&L**

Carolina Power & Light Company

22 NOV 2 10 H. B. ROBINSON STEAM ELECTRIC PLANT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550

OCT 29 1982

Robinson File No: 13510E

Serial: RSEP/82-1807

Mr. James P. O'Reilly  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W., Suite 3100  
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENCE NO. DPR-23  
RESPONSE TO IE INSPECTION REPORT NO. 82-32

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

Carolina Power and Light Company acknowledges the Violation.

A. Severity Level IV Violation

Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established and implemented that meet or exceed the requirements of Sections 5.2 and 5.3 of ANSI N18.7-1976 and Appendix A of USNRC Regulatory Guide 1.33 Revision 2.

Contrary to the above, procedures and administrative policies were not adequately established and implemented in that:

1. IER-82-32-01

FSAR Section 6.3 and Operating Procedure-42A, Safety Injection and Containment Spray Checkoff List, Revision 21, require that containment spray system valves SI-892A, 892F, 892G, and 892H for sodium hydroxide addition be locked open. On August 25, 1982, these valves were found open but not locked.

a. Reason For The Violation

These four valves are T-handle valves which are more difficult to properly lock than valves with spoked handwheels. The chains on these valves had been removed and then reinstalled to facilitate tightening of the stem packing nuts. It could not be determined who reinstalled the chains, but he apparently did not understand how to install them and failed to verify that the chains would perform their intended function. A figure 8-looping of the T-handles with the locking chain is required on these valves to prevent their operation. Carolina Power & Light Company believes that this is an isolated case.

b. Corrective Steps That Have Been Taken

The valve chains and locks on these four valves have been re-hung such that these valves cannot be operated.

c. Corrective Steps That Will Be Taken To Avoid Further Violation

The Administrative Instructions will be revised to include a general description of the purposes, procedures, and philosophies concerning valves with chains and locks.

d. Date When Full Compliance Will Be Achieved

The Administrative Instructions will be revised, and Operations personnel will review the revision by December 10, 1982.

2. IER-82-32-02

The control of corrective maintenance and adequate correction of nonconforming conditions required by 10CFR50 Appendix B, Criterion XVI, is implemented by Corporate Quality Assurance Program Sections 13.4 and 15. At Robinson 2, this corrective action program is implemented by Administrative Instructions Section 15 and Maintenance Instruction-1 which require periodic review of work performed on equipment in order to establish adverse equipment trends and initiate appropriate corrective action. As of September 1, 1982, the repetitive degradation of "B" Emergency Diesel Generator air compressor control and protective features exhibited since November, 1981 had not been corrected.

a. Reason For The Violation

Repeated maintenance on the "B" Emergency Diesel air compressor relief valve and pressure switches, and unsuccessful attempts to determine why the compressor motor was tripping on overload, resulted in placing the compressor under clearance until a manufacturer's Technical Representative could be brought on site to assist in identifying the root cause of these problems.

It should be noted that the Corrective Action Program, AI-15, is not intended to identify the inspector's concern of a component not receiving prompt attention per se, but Maintenance Instruction MI-1 is designed to identify long term (over a year or more) maintenance trends that otherwise go undetected. MI-1 did not identify that this compressor was having extra ordinary maintenance attention as its problems did not fall into the long term aspect of the Maintenance Instructions design. However, the repetitive problems of this compressor were known to the Maintenance management who were attempting to resolve the root cause of the problem.

b. Corrective Steps That Have Been Taken

On the advice of the manufacturer's Technical Representative, a smaller pulley was installed between the compressor and the motor. This resulted in a lower operating current that, although is higher than expected, allows the compressor to operate without tripping on overload. The compressor is back in service.

c. Corrective Steps That Will Be Taken To Avoid Further Violation

Although the problems with the compressor were given additional management attention when it was discussed as an NRC inspector's concern, it is CP&L's opinion that this compressor would have gotten the appropriate maintenance attention. Tracking of short term (1 year) maintenance items, such as this compressor, are best served by the skills and day-to-day observations of the Plant Maintenance management personnel.

At the present time, the Maintenance Instruction MI-1 should remain a long term maintenance trending tool, and should not be ammended because of this particular event.

d. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

3. IER-82-32-03

Periodic Test (PT) 12.2, Radiation Monitoring System, was established to satisfy the functional test requirements of Technical Specification Table 4.1-1, Item 19. As of August 19, 1982, Periodic Test 12.2 did not contain acceptance criteria for measured values, as-found high alarm setpoints for automatic safety functions were not checked for accuracy, and corrective action was not taken to resolve monitor reading discrepancies.

a. Reason For The Violation

Periodic Test PT-12.2 and its acceptance criteria were written in concert with the original understanding of the functional test requirement of Technical Specification 4.1-1, Item 19. Dynamic changes in regulator interpretations of the intent of the operability of the Radiation Monitoring System (RMS) were addressed in the expansion of Standing Order Number 4 (SO-4). Standing Order SO-4 provides the operator with a list of setpoints for the RMS system along with a discussion of the basis for calculation of these setpoints. Standing Order SO-4 also references the "Setpoint Log and Change Record" which operators use to maintain an up-to-date setpoint record for all Radiation Monitors. Relative to SO-4, very few changes were made to PT-12.2 as this PT was known to satisfy the test requirement of Technical Specification 4.1-1, Item 19. This has resulted in a Periodic Test that meets the Technical Specification but contains an acceptance criteria that generalizes and does not specifically address the acceptability of specific steps of the Periodic Test.

b. Corrective Steps That Have Been Taken

Until the corrective steps listed below can be made to PT-12.2, the readings in PT-12.2 will be compared to the Setpoint Log and Change Record to ensure the setpoints are in fact as they were set by the operators.

c. Corrective Steps That Will Be Taken To Avoid Further Violation

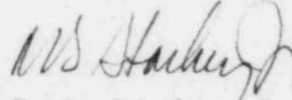
The acceptance criteria of PT-12.2 will be revised to ensure it specifically addresses the acceptability of the specific steps within the Periodic Test, to meet the Technical Specification, and to initiate corrective actions as necessary.

d. Date When Full Compliance Will Be Achieved

Periodic Test PT-12.2 will be revised as stated above by  
January 15, 1983.

If you have any questions, please contact me.

Very truly yours,



R. B. Starkey, Jr.  
General Manager  
H. B. Robinson SEG Plant

CLW/bss

cc: R. C. DeYoung