CP&L

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

APR 15 1982

Robinson File No: 13510E Serial: RSEP/82-726

Mr. James P. O'Reilly
Regional Administrator
USNRC 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
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT 82-04

Dear Mr. O'Reilly:

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

A. Severity Level V Violation - IER-82-04-05

Technical Specification 6.8.1 requires that written administrative policies shall be implemented that meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33 dated November 3, 1972. Administrative Instructions Section 4.1 of the Plant Operating Manual implements these requirements. Administrative Instructions Section 4.1.14 and Standing Order 12 require that control operators review the annunciator status prior to shift turnover. Section 4.1.11 requires that the Operator's log contain entries on equipment malfunctions or failures and unusual conditions observed, and that the Unit 2 Shift Foreman's Logbook contain a detailed explanation of major events, including reportable and unusual occurrences.

Contrary to the above, on November 25, 1981, annunciator status was not reviewed prior to shift turnover and required log entries were not made. Boron Injection Tank pressure buildup occurred over several shifts and resulted in an annunciator alarm at least

several hours prior to challenging the relief valve. The condition was discovered about one hour after a shift turnover when the pressure ndication was found offscale high. No log entries were made in either the Operator's Log or the Shift Foreman's Log concerning this occurrence or its resolution.

1. Admission or Denial of the Alleged Violation

   Carolina Power and Light Company acknowledges the above violation.

2. Reason For the Alleged Violation

   At the time of the event, the significance of the potential overpressurization of BIT was not recognized by the operating shift due to the nonrelevant annunciators normally illuminated during cold shutdown and the increased activity in the control room during the outage. Since the significance of this event was not recognized at this time, it was not logged.

3. Corrective Steps Which Have Been Taken and Will Be Taken to Avoid Further Violations

   The need to use established plant procedures will be stressed to all operators to: 1) promptly identify and correct plant abnormalities, 2) provide adequate documentation of the abnormality in the plant logs, and 3) thoroughly turnover to the oncoming shift adequate information concerning abnormalities that could not be corrected or for which corrective action is in progress.

4. Date When Full Compliance Will Be Achieved

   The reviews with all operators noted in item 3 will be completed by May 14, 1982.

B. Severity Level V Violation - IER-82-04-04

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33 dated November 3, 1972. Volume 16, Annunciator Procedures, of the Plant Operating Manual were established to implement these requirements.

Contrary to the above, as of January 7, 1982, the licensee failed to maintain adequate annunciator procedures for the Boron Injection Tank (BIT) heater high pressure annunciator in that this procedure:

(1) provided no required operator action on receipt of the alarm,

(2) provided no cautions or guidance concerning the fact that the BIT heaters have frequently caused pressurization of the BIT since the installation of a stainless steel BIT in 1978. These inadequacies contributed to the overpressurization of the BIT on November 25, 1981.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the above violation as stated.

2. Reason For the Alleged Violation

This violation resulted from the fact that when the new Boron Injection Tank (BIT) was installed in 1978 no one anticipated the problem of BIT overpressurization from the operation of the tank strip heaters. Thus, no revision to the annunciator procedure for a BIT high pressure condition was considered necessary. In addition, once the problem occurred, the short term corrective action (venting the BIT back to the boric acid storage tanks) was obvious to the operating staff. Thus, revisions to the BIT high pressure annunciator procedure were not considered.

3. Corrective Steps Which Have Been Taken and Results Achieved

Annunciator procedure A2-19 was revised on February 4, 1982. "BIT heater activation" was added to the causes for the alarm and "Vent BIT as necessary through CVC-841A and B (to BA tanks)" was added to the action steps.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

A review of the Reactor Turbine Generator Board (RTGB) annunciator procedures is in progress. This review is intended to identify and include in the procedures all known "causes" or "symptoms" for the alarm condition. The review will also ensure that "corrective action" steps addressing the "causes" are included in the procedures.

5. Date When Full Compliance Will Be Achieved

The review of the RTGB annunciator procedures will be completed and appropriate changes, if required, will be approved by August 27, 1982.

C. Severity Level V Violation - IER-82-04-01

Technical Specification 6.8.1 requires that written administrative policies shall be implemented that meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33 dated November 3, 1972. Administrative Instructions Section 11 implements these requirements for equipment control and requires that applicable valves be listed on the clearance and that affected valves are returned to their appropriate position after completion of maintenance.

Contrary to the above, as of February 10, 1982, these equipment control policies are not implemented in that Local Clearance and Test Request 113 listed incorrect auxiliary feedwater system valves for the maintenance performed and the clearance was cancelled without opening the isolation valve for a local suction pressure gauge.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light acknowledges the above violation as stated.

2. Reason for the Alleged Violation

An incorrect valve number was used with the correct noun name to identify a valve on the subject Local Clearance and Test Request (LCTR). The LCTR Tag was incorrectly labeled which complicated the initial error. The proper valve was closed, tagged and the proper maintenance performed. When the LCTR was cancelled the Operator failed to ensure that all tags were removed prior to signing the LCTR as completed.

3. Corrective Steps Which Have Been Taken and Results Achieved

The proper use of the Local Clearance and Test Request and the above errors were discussed with those individuals involved. Those personnel directly involved were appropriately admonished.

4. Corrective Steps Which Will Be Taken to Avoid Futher Violations

A Plant Operating Experience (POE) Report is being developed as a result of the above discussions. This report will be reviewed with all operators to avoid a similar occurrence.

5. Date When Full Compliance Will Be Achieved

This POE will be reviewed with all operators by June 1, 1982.

If you have questions concerning this response, please contact me.

Very truly yours,

for R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

CW/bs