



Carolina Power & Light Company

A 7.44

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

MAR 25 1983

Robinson File No: 13510E

Serial: RSEP/83-369

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 NUMBER 50-261  
LICENSE NUMBER DPR-23  
RESPONSE TO IE INSPECTION REPORT IER-83-02

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 IV Violation (IER-83-02-01-SL4)

Technical Specification 6.5.1.1.1 requires that written procedures be established and implemented that meet the requirements and recommendations of Appendix A of Regulatory Guide 1.33, Revision 2, for control of safety-related equipment. The following procedures were established to meet the requirements for control and correct positioning and locking of valves in the Containment Spray System: Administrative Instructions, Section 4.0, Standing Order-9, Operating Procedure-42, and Periodic Test-3.4.

Contrary to the above, as of January 24, 1983, procedures had not been implemented in that the Spray Additive Flow Eductor Test Valve (SI-892D) was open vice closed and Containment Spray Pump A Eductor Discharge (SI-892F) was unlocked.

Response

1. Admission Or Denial Of The Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason For The Violation

An investigation concluded that specific reasons for 892D to be open and 892F to be unlocked could not be determined.

3. Corrective Steps Which Have Been Taken And Results Achieved

The subject valves were returned to their proper configuration.

The various groups on site were interviewed to determine if there has been recent activity associated with these valves or in the vicinity of these valves that may have contributed to their improper configuration. Nothing unusual was identified in these interviews. Those individuals involved in a recently performed periodic test, which included repositioning these valves, were interviewed, and they remembered returning these valves to their required configuration.

On February 15, 1983, a program was implemented in which the Shift Technical Advisors (STAs) perform visual position verifications for selected valves on safety-related systems every four weeks. This program should identify if the configuration of a valve changes contrary to the requirement of an approved Plant procedure. In keeping with ALARA, Plant Management will reduce the frequency of these periodic valve checks as the problems are identified and resolved such that they no longer exist.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

Programs to visually verify positions of valves are also being developed by the Quality Assurance (QA) and Onsite Nuclear Safety (ONS) Groups. These programs will be implemented in concert with the STA program and will result in an overall site valve verification program. This site program will be reviewed and revised as necessary based on experience gained in its implementation. If it is determined that this program is no longer contributing to overall Plant safety, it may be discontinued.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the subject valves being returned to their proper configuration and with the implementation of the STA valve verification program. The site valve verification program will be fully implemented by June 30, 1983.

B. Severity Level IV Violation (IER-83-02-03-SL4)

10CFR50, Appendix B, Criterion 16, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. With respect to malfunctions affecting safety-related equipment, these requirements are implemented by the Corporate Quality Assurance Program, Sections 5 and 15, and by Administrative Instructions, Sections 2.0 and 4.0, and Maintenance Instruction-1. These instructions require prompt identification of and determination of appropriate corrective actions for malfunctions on safety-related equipment.

Contrary to the above, as of February 7, 1983, these instructions were not implemented in that the low air flow alarm conditions existing on February 5-7, 1983, on containment air recirculation unit HVH-3 was not identified to Plant Management or Maintenance supervision. This failure to initiate corrective actions resulted in HVH-3 being unable to automatically start under conditions of safety injection actuation coincident with station blackout during the above period.

Response

1. Admission Or Denial Of The Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason For The Violation

Neither the annunciator procedures nor the other instructions and procedures, available to the Operating shift, described that whenever the low flow alarm was in, the HVH unit would not auto-start on a simultaneous safety injection signal and station blackout signal. The annunciator procedure did erroneously describe the HVH unit as tripping on a low flow alarm, and the Operating shift was aware of a modification made to the circuit which defeated this trip function. Therefore, the Operating shift concluded, in error, that all the auto functions associated with the alarm were disabled; and, thus, they did not escalate the alarm condition.

3. Corrective Steps That Have Been Taken And Results Achieved

Those responsible for ensuring appropriate action was taken when the low flow alarm was received have been made aware of the error in not escalating the alarm condition. The Onsite Nuclear Safety Unit is reviewing this event for inclusion in the Operational Experience Program.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

The above corrective action should prevent further violation.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

C. Severity Level V Violation (IER-83-02-04-SL5)

Technical Specification 6.5.1.1.1 requires that procedures be established and maintained which meet the requirements of Appendix A to Regulatory Guide 1.33, Revision 2. Volume 16, Annunciator Procedures, implements these requirements with respect to procedures for alarm conditions.

Contrary to the above, as of February 7, 1983, Annunciator Procedures A2-5, A2-13, A2-21, and A2-29 had not been maintained in that they indicate that containment air recirculation units automatically trip on a loss of air flow. This feature was removed during modification activities in 1974.

Response

1. Admission Or Denial Of The Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason For The Violation

During an investigation into a problem of a HVH low flow alarm, the Plant identified an error with the annunciator procedures. The 1974 modification, which removed the HVH unit automatic trip on a low flow alarm, did not revise the annunciator procedures. A review of annunciator procedures in May, 1981, did not identify that these low flow annunciators no longer caused the units to automatically trip.

3. Corrective Steps Which Have Been Taken And Results Achieved

Annunciator Procedures A2-5, A2-13, A2-21, and A2-29 have been appropriately revised. The modification procedure was completely revised in 1982 and now requires changes to applicable Plant annunciating procedures.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

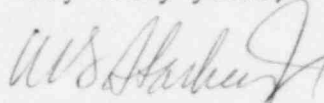
The annunciator procedure changes that corrected this problem have been routed to Operations personnel for their review in accordance with the applicable Training Instruction. The techniques used in the 1981 review of the annunciator procedures will be reevaluated to determine if this violation was an isolated case or if another approach in reviewing the annunciator procedures is necessary.

5. Date When Full Compliance Will Be Achieved

The evaluation of the 1981 annunciator procedure review techniques will be completed by June 1, 1983.

If you have any questions, please contact my staff or me.

Very truly yours,



R. B. Starkey, Jr.  
General Manager

H. B. Robinson SEG Plant

CLW:FMG:JMC/bss