Form 244

CP&L

Carolina Power & Light Company

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

Company Correspondence

JAN 27 1984

Robinson File No: 1351CC

Serial: RSEP/84-57

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

H. B. ROBINSON S. E. PLANT
UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT 83-33

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-83-33-04-SL4).

10CFR50, Appendix B, Criterion II, as implemented by the licensee's Corporate Quality Assurance Program, requires that activities affecting quality shall be accomplished under suitably controlled conditions.

Contrary to the above, as of November 5, 1983, the licensee failed to establish suitable controls on activities affecting safety-related service water equipment in that underground power, control, and indication electrical cables for service water pumps and valves were damaged during power excavation activities.

Response

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reasons for the Violation

On November 4, 1983, the unit was in cold shutdown. During power excavation associated with the construction of a new radioactive waste facility in the Unit 2 Protected Area, a backhoe operator on a

night shift crew damaged safety-related service water cables. Investigation of the event indicated the following deficiencies:

- poor communication occurred between the day shift and night shift crews.
- the information on the drawing which showed the underground obstructions in the excavation area was not adequate.
- a drawing with adequate excavation information was not readily available at the work site.
- markings had been made on the asphalt to indicate the underground obstructions, but the markings were not in place when the excavation began because the marked asphalt had been previously removed.
- contractor personnel did not adequately involve CP&L personnel when the damage first occurred.

3. Corrective Steps Which Have Been Taken and the Results Achieved

The underground cables, which are necessary for Plant operation, that were damaged have been repaired and returned operable.

The instructions and the authorization form for power equipment excavation were revised and issued by memorandum to all construction supervision on November 14, 1983. This memorandum required the instructions to be followed prior to resuming excavation activities. The instructions included: (1) a training session with excavating equipment operators and their foremen must be performed to ensure their understanding of the procedure, (2) a drawing indicating known obstructions must accompany the authorization form, (3) the detector operator who scans the area for obstructions must validate the drawing, (4) the authorization form and the drawing must be available at the excavation site, (5) additional signatures are required on the authorization form to ensure better communications, and (6) the authorization form is valid for only one shift.

These instructions were thought to be fully satisfactory. However, on December 27, 1984, during an excavation operation outside the Unit 2 Protected Area, underground cables and a pipe serving Deep Well Pump B were accidentally damaged. After a thorough investigation, it was determined that further improvements to the excavation instructions were necessary. These were: (7) known obstructions as revealed by detecting instrumentation will be uncovered by hand digging before power excavation begins and/or a detector operator will be present during the excavation and (8) a map was provided to designate the boundaries of the site in which the authorization form is to be used. Adherence to the above instructions should prevent further violation. However, if damage to underground facilities does occur accidentally, excavation work will be stopped until additional CP&L management reviews are conducted.

4. Corrective Step Which Have Been Taken To Prevent Further Violation

Construction Procedures will be implemented to include the above power equipment excavation instructions that are now in effect by memorandum.

5. Date When Full Compliance Will Be Achieved

The appropriate construction procedures will be implemented by April 2, 1984.

B. Severity Level V Violation (1ER-83-33-01-SL5).

Technical Specification 6.5.1.1.1.a. requires that written procedures be implemented which meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures for equipment control. Administrative Procedure-027, Section 11.6, established the management controls for implementation of these requirements.

Contrary to the above, as of November 21, 1983, these procedures were not adequately implemented with respect to clearance 83-1613 in that fuses removed to disable the three main steam isolation valve control circuits were not identified by circuit affected, and the appropriate clearance tags were not placed on those circuits.

Response

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

While the unit was in cold shutdown, a master secondary clearance was issued which in part included pulling the twelve control power fuses for the Main Steam Isolation Valves (MSIV). There are two sets of fuses on each of two auxiliary panels for each MSIV. These twelve fuses were removed and placed under the control of the control operator. Three clearance tags were assigned to these fuses, one tag for all the fuses on each MSIV. However, because each MSIV has two sets of fuses, there should have been two tags issued for each MSIV and the circuit identified for each tag.

The person issuing the clearance did ensure that all the fuses were pulled and placed under control of the control operator; however, he failed to assign the appropriate number of tags for the fuses to identify the circuits on the tags and to issue the three tags he did assign. The person receiving the clearance failed to inspect the clearance tags as required by procedure.

3. Corrective Steps Which Have Been Taken and Results Achieved

Prompt action was taken to hang the appropriate tags and to identify the circuits on the tags. The person issuing the clearance and the person receiving the clearance have both been counseled by their supervisors and have reviewed the event and identified the errors which were made.

4. Corrective Steps Which Will Be Taken and Results Achieved

The events of this violation have been entered into the Operational Experience Feedback Program which ensures that other Plant personnel become aware of these errors. This should prevent its recurrence.

5. Date Whe Full Compliance Will Be Achieved

Full compliance has been achieved.

C. Severity Level V Violation (IER-83-33-03-SL5).

Technical Specification 6.9.2.b(2) requires that conditions leading to operation in a degraded mode permitted by a limiting condition for operation be reported within thirty days by written report to the Regional Administrator of Region II.

Contrary to the above, as of December 5, 1983, the inoperability of one train of the low temperature overpressure protection system on November 4, 1983, had not been reported or identified as a reportable occurrence.

Response

1. Admission or Denial of The Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason For the Violation

On November 4, 1983, at 0130 hours, with the unit shutdown and cooling down, one of the two Pressurizer Power Operated Relief Valves, PORV-456, failed to meet the required cycle time of less than two seconds. By definition, failing to meet the required cycling time rendered the valve inoperable. The Low Temperature Over Pressure Protection System (LTOP) was placed in service at approximately 0200 hours. Technical Specification 3.1.2.1.d requires the LTOP system to be placed in service when the RCS temperature is below 350°F and not vented to containment. This specification also states that if the inoperable PORV is not returned to service within seven days, then within twelve hours cooldown and depressure the RCS, or heat up to greater than 350°F. The Plant was cooling down for an outage so the LTOP system would be in operation for less than one day. The Technical Specification was

misunderstood to mean that the event would not be reportable as long as the PORV was returned to service within seven days. LTOP was in service for less than one day. The event should have been reported as a thirty day LER because the Plant entered a limiting condition for operation.

3. Corrective Steps Which Have Been Taken and Results Achieved

This November 4, 1983 event was reported as License Event Report (LER) 83-32 on January 5, 1983. The new LER rule, 10CFR50.73 was effective January 1, 1984. This event would not be reported had it occurred after January 1, 1984. A Plant procedure is in place to meet the requirements of 10CFR50.73. Appropriate personnel have been trained on new procedures to enhance reporting capability. The requirement to have reported this event under the Technical Specification in effect in 1983 has been discussed with those involved.

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

No further action is necessary to prevent further violation.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the issuance of LER-83-32 on January 5, 1984.

If you have any questions concerning this response please contact my staff or me.

Very truly yours,

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

CLW/tld

cc: R. C. DeYoung
S. Weise