



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT

Post Office Box 790

Hartsville, South Carolina 29550

MAY 25 1984

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Robinson File No: 13510E

Serial: RSEP/84-370

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT

DOCKET NO. 50-261

LICENSE NO. DPR-23

I.E. INSPECTION REPORT IER-84-09

Dear Mr. O'Reilly:

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

1. Severity Level IV Violation (IER-84-09-05-SL4).

10 CFR 50 Appendix B Criterion XVI, as implemented by the Licensee's Corporate Quality Assurance Program Section 15, requires that measures shall be established and implemented to assure that significant conditions adverse to quality are promptly corrected and corrective action is taken to preclude repetition.

Contrary to the above, as of April 5, 1984, procedural revisions required to prevent recurrence of violation 261/83-24-05 were not made. Your response, dated November 3, 1983, to violation 261/83-24-05 stated you would complete the corrective action by March 31, 1984.

RESPONSE:

A. Admission or Denial of the Alleged Violation.

CP&L acknowledges that the procedure revisions committed to in response to IER-83-24 were not completed by March 31, 1984. However, it should be noted that the interim corrective actions also committed to in response IER-83-24 were still in place.

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B. Reason for the Violation.

Violation B of IER-83-24 identified that although the functional testing of safeguard switches associated with the reactor safeguards circuitry included a continuity test of the switch in the test position, it did not include a continuity test of the switch in its normal position. When the concern was identified, the switch in question was successfully tested for continuity in its normal position. In response to the violation, a commitment was made to either revise or establish procedures which include a continuity check of the switch in its normal position.

The procedures were scheduled to be completed by March 31, 1984. CP&L also stated that, in the interim, work requests for testing these switches would contain a note to contact the I&C foreman for post maintenance testing if the switch is replaced. The interim action has been in place and will continue to be in place until the procedures are completed.

Inspection report IER-83-24 included the subject violation and another violation with similar corrective action. The Plant was formally tracking both of these violation response commitments. In February 1984, when this other violation was closed by the Plant, the commitment to revise the procedures by March 31, 1984 was inadvertently closed by the same document.

Because of the similarity of corrective actions with both violations, the error was also missed in the review process. Although the formal commitment tracking system stopped tracking the subject item in February of 1984, the interim corrective action, which was a part of the same commitment, was in place and continuing, and therefore, this item is not a safety concern. This item is considered a case of isolated personnel error due, in part, to the similarity of corrective actions in the two previously mentioned violations.

C. Corrective Steps Which Have Been Taken.

The individuals who mistakenly determined that the subject item was completed have discussed this event. A letter dated April 27, 1984, has been sent to the NRC explaining that the interim action is continuing and that the procedure changes have not been completed and have been rescheduled.

D. Corrective Steps Which Will Be Taken.

No further action is planned.

E. Date When Full Compliance Will Be Achieved.

Full compliance has been achieved.

2. Severity Level IV Violation (IER-84-09-01-SL4).

10 CFR 2.201 requires the licensee to submit to the NRC a written reply to a Notice of Violation. This reply shall include both corrective steps which will be taken to avoid further violations and the date when full compliance will be achieved.

Contrary to the above, your response to violation 261/83-33-01, dated January 27, 1984, stated that you had entered the events of this violation into the Operation Experience Feedback Program which ensures that other Plant personnel become aware of the errors to prevent recurrence. You also stated full compliance had been achieved. In fact, the events of this violation were not entered into the Operation Experience Feedback Program until March 21, 1984.

RESPONSE:

A. Admission or Denial of the Alleged Violation.

CP&L acknowledges the alleged violation.

B. Reason for the Violation.

In response to Violation 83-33-01 dated January 27, 1984, under "Corrective Steps To Be Taken," it was stated that the events have been entered into the Operation Experience Feedback (OEF) program. This statement was based on a verbal discussion between personnel preparing the violation response and those responsible for maintaining the OEF program. No formal written correspondence was issued, nor was the final written response reviewed by management personnel involved in the OEF program. One reason for the final written response not being reviewed by the OEF organization's management is that this group is not within the line organization of the Plant which approves written responses, and therefore, they are not normally in the approval process.

C. Corrective Steps Which Have Been Taken.

The individuals involved in the verbal communication have discussed this event and are now aware of the appropriate method to log events into the OEF program. In addition, personnel involved in preparing responses to the NRC have discussed the importance of ensuring a management review by all groups involved in an NRC response, whether they are within the Plant organization or outside of it. This should prevent further violations.

D. Corrective Steps Which Will Be Taken.

No further action is necessary.

E. Date When Full Compliance Will Be Achieved.

Full compliance has been achieved.

3. Severity Level V Violation (IER-84-09-02-SL5).

Technical Specification 6.5.1.1.1.a. requires that written procedures be established which meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures for maintenance on safety-related valves. Maintenance Procedures CM-109, CM-120, and CM-104 were established, in part, to control maintenance on safety-related gate and swing check valves, including those associated with the reactor coolant pressure boundary pursuant to IE Bulletin 82-02.

Contrary to the above, as of April 5, 1984, procedures had not been adequately established in that:

1. CM-109 did not address threaded fastener reassembly torque sequence, did not provide the adequate torque increment guidance, specified an improper lubricant, and did not address proper disc orientation for valve RHR-750.
2. CM-120 did not specify the approved lubricant.
3. CM-104 did not address proper disc orientation for valves CVC-350 and SI-862B.

RESPONSE:

A. Admission or Denial of the Alleged Violation.

CP&L acknowledges the alleged violation.

B. Reason for the Violation.

1. Procedure CM-109 addresses only RHR suction valve RHR-750 and 751. Of all the procedures that address primary closure studs as discussed in IEB-82-02, CM-109 is the only one that does not specifically address torque sequencing and torque increments. However, CM-109 does state "compress gasket equally." This was believed adequate to ensure that the mechanics applied the skill of their craft to properly torque the bolts on these two valves.

The vendor did not specify a lubrication for valve bonnet studs. Because these valves have stainless steel bodies, and the vendor recommended neolube on stainless steel threaded fasteners which are exposed to primary coolant fluid, CM-109 specified the use of neolube on the bonnet studs.

In CP&L's July 30, 1982 response to IEB-82-02, it was stated, "In accordance with NSSS vendor recommendations, the lubricant for all primary closure studs at HBR2 is Fel-Pro-N-5000...." The intent was to say that CP&L's lubrication program would be in accordance with the vendor recommendations. In case of the bonnet studs on RHR-750 and 751, the recommended lubrication is understood to be neolube.

One of the discs on RHR-750 has a drilled hole. CM-109 inadvertently left out specific guidance on proper disc orientation.

2. CM-120 addresses check valves SI-875 and SI-876. CM-120 mentions to lubricate the studs but does not specify the lubricant to be used.
3. CM-104 addresses gate valve maintenance. Step 7.1.9 of CM-104 states that during disassembly "Observe previous match marking of disc to seat. If not present, match mark the components to facilitate proper reassembly." This statement covers all gate valves and is considered adequate. In addition, a caution was placed on valves 861A and 861B as part of a recent modification. The concern of the violation was that valves CVC-350 and SI-862B which had the same condition as 861A and 861B, one drilled disc, were not assigned a special caution on disc orientation.

C. Corrective Steps Which Have Been Taken.

The subject procedures have been reviewed against the concerns of IEB-82-02. The corrective actions involve procedure changes and do not require immediate revision.

D. Corrective Steps Which Will Be Taken.

1. Procedure CM-109 will either be revised to specify torque requirements, the proper lubrication and disc orientation, or be deleted, and the requirements for RHR-750 and RHR-751 will be included in procedure CM-104, "Gate Valve Maintenance."
2. Procedure CM-120 will be revised to specify the approved lubricant.
3. Procedure CM-104 will be revised to either delete the disc orientation caution on valves 861A and 861B or the caution will be made generic to all double disc valves with one drilled disc.

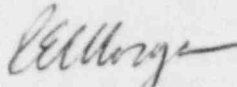
E. Date When Full Compliance Will Be Achieved.

The above-mentioned corrective actions are scheduled to be completed by October 1, 1984.

Letter to Mr. James P. O'Reilly
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If you have any questions concerning this response, please contact me or my staff.

Very truly yours,



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

CLW/bhm

cc: R. C. DeYoung
S. Weise