



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report No. 50-261/80-21

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Facility: H. B. Robinson

Docket No. 50-261

License No. DPR-23

Inspection at Robinson Facility near Hartsville, SC

Inspector: GK Hardin for
J. A. McDonald

Approved by: P. J. Kellogg Section Chief, RONS Branch

9/15/80

Date Signed

9/15/80

Date Signed

SUMMARY

Inspection on August 18-22, 1980

Areas Inspected

This routine, announced inspection involved 40 inspector-hours onsite in the areas of IE Bulletin followup and plant tour.

Results

Three apparent items of noncompliance were found in the two areas; (Infraction - failure to review procedure change, Paragraph 5.a; Infraction - failure to establish or implement maintenance procedures Paragraph 6.a; and Deficiency - failure to complete operator required reading, Paragraph 6.b).

DETAILS

1. Persons Contacted

Licensee Employees

*R. Starkey, Plant Manager
*R. Connolly, Director Nuclear Safety and QA
*C. Crawford, Manager Operations and Maintenance
*J. Curley, Engineering Supervisor
*B. Garrison, QA Supervisor
*F. Lowery, Operations Supervisor #2
C. Wright, Assistant Operations Supervisor #2
*S. Zimmerman, Manager, Technical and Administration

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 22, 1980, with those persons indicated in Paragraph 1 above. The licensee commented that the nonconforming conditions of the freeze protection system discussed in Paragraph 6a would probably have been identified when the licensee routinely looks at the system in the fall. The backup nitrogen regulator PCV-1049 was directed to be returned to service; however, it was undergoing an anticipated two or three hours of maintenance before being lined up to satisfy the immediate corrective action to the item of noncompliance discussed in Paragraph 5.a.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. IE Bulletin Followup

The inspector reviewed the licensee's response letter, Serial No. 80-832 to IE Bulletin 80-05, Vacuum Condition Resulting in Damage to Chemical Volume Control System (CVCS) Holdup Tanks (HUT). Vent paths were visually verified for the Refueling Water Storage Tank, Auxiliary Building Sump Tank "A", and the Chemical Drain Tank in conjunction with the Laundry and Hot Shower drain tanks. The operation of the vent header which provides cover gas for the three CVCS HUT was reviewed. Findings were acceptable except as follows:

- a. During normal operation of the vent header, cover gas was supplied from the Waste Gas Decay tanks via a pressure regulator and this was to be backed up by a pressure regulator with lower setpoint which provides clean nitrogen. The nitrogen backup regulator was shown to

have a normally open inlet isolation valve (1661) on FSAR Figure 11.1-2, Waste Disposal System. This was further amplified in the Precautions, Limitations and Setpoints document which stated that for proper operation for the vent header, the nitrogen backup regulator as well as the other regulators affecting vent header pressure must be set within specified operating bands. At the time of the inspection, the nitrogen regulator was removed from service. From discussion with operating personnel, this practice had been routine for at least the last two years, with a primary consideration being the minimization of the volume of waste gas. The Operations Supervisor was not aware of the practice and no formal review had been conducted to determine the appropriateness of this action. This failure to review a change to the facility constitutes an item of noncompliance (50-261/80-21-01).

- b. The licensee's original review of the bulletin did not apparently address:
 - (1) The design operation of PCV-1049.
 - (2) CVCS HUT withdrawal rate for two evaporator operation.
 - (3) The absence of a calibration program for PCV-1027, 1049, 1050, and 1051 which would assure satisfaction of the Precautions, limitations, and setpoints document.
 - (4) The potential for maloperation of PCV-1027 based on downstream piping configuration.
 - (5) the variables of gas decay tank pressure and CVCS HUT level on the rate of HUT depressurization during a withdrawal, with and without failure of PCV-1027 and/or PCV-1049.

The plant manager committed to the submission of a supplemental response to the Bulletin prior to the conclusion of the current refueling outage (early October). This supplemental response will address the further review of the Bulletin concerns and proposed implemented administrative controls and/or system modifications to protect the CVCS HUT against vacuum conditions. Until the appropriate review of IE Bulletin 80-05 and resultant corrective actions are completed, this item is open (50-261/80-21-02).

6. Plant Tour

The inspector toured the control room, the area of the main steam isolation valves and the associated steam lines to the auxiliary feed pump and pressure transmitters for the steam break protection system. Findings were acceptable except as follows:

- a. The following nonconforming conditions existed either as a result of inadequately established or implemented maintenance procedures:

- (1) The electrical junction box containing safety-related control circuits for MS-V1-3B had holes in the box and its inspection plate loose.
- (2) Freeze protection wiring for the steam break protection system pressure transmitters were missing three conduit body covers. Freeze protection wiring for the PT-486 condensing pot was missing insulation and appeared to be grounded to the conduit.
- (3) Five bolts in the seismic support structure for the "A" main steam line were loose.
- (4) The cable conduit for auxiliary feed pump steam supply valve MS-V1-8B was not fastened either to its support or its junction box.

This failure to control maintenance activities constitutes an item of noncompliance (50-261/80-21-03).

- b. The required reading material in the control room was approximately sixteen inches thick. The requirements of 10 CFR 55, Appendix A, for operator cognizance of changes to plant procedures and design was implemented by Instruction 303, Dissemination of Information. This instruction required that the reading material be identified and routed to the licensed operations; however, it did not stipulate any requirements for timeliness of review and the inspector noted the following review status for a sample of reading items:

<u>Date Issued</u>	<u>Subject</u>	<u>Not Reviewed</u>
4/29/80	AP-24 Loss of Instrument Bus	10
4/9/80	AP-18 Loss of Component Cooling Water to Reactor Coolant Pumps	10
9/19/79	GP-2 Cold Solid to Hot Subcritical at 540F	5
12/27/79	M-501 Core Subcooling Monitor Modification	3
12/27/79	M-498-2, -3, -4 Emergency Plan Alarm Modifications	4
12/7/79	EI-1 Loss of Reactor Coolant	3

This failure to assure operators were currently cognizant of facility design and procedure changes constitutes an item of noncompliance (50-261/80-21-04).

- c. Some degradation of equipment in the MSIV area was observed including:

- (1) The armor was broken on armored cables providing control for MS-V1-3B and the auxiliary feed pump steam supplies MS-V1-8A and -8B.

- (2) MS-25A and MS-34C had no handwheels.
- (3) Insulation did not completely cover the PT-485 condensing pot as designed.

Plant Management agreed that inspection for these types of nonconforming conditions should be incorporated into the current housekeeping program. Until the licensee establishes measures to identify nonconforming conditions which have been caused by continued operations or operations activities, this item is open (50-261/80-21-05).