

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

Report No. 50-261/80-30

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

Facility Name: H. B. Robinson

Docket No. 50-261

License No. DPR-23

Inspectors: Approved by: Section Chief, RONS Branch

# SUMMARY

Inspection on September 30 - October 9, 1980

Areas Inspected

This routine, announced inspection involved 96 inspector-hours on site in the areas of plant operation, surveillance testing, maintenance witnessing, plant modification review, technical specification review, fire protection, physical security, housekeeping and cleanliness control, document control and radioactive waste handling and storage.

## Results

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Of the 10 areas inspected, no items of noncompliance or deviations were identified in 9 areas; one item of noncompliance was found in one area (Infraction: failure to implement and/or maintain procedure for radioactive waste handling and storage - (Paragraph 14).

# DETAILS

## 1. Persons Contacted

Licensee Employees

\*R. Starkey, Plant Manager
\*S. Zimmerman, Technical & Administration, Manager
\*J. Curley, Engineering Supervisor
\*L. William, Security Specialist
\*S. Crocker, Radiation Control Supervisor
\*C. Bethea, Training Supervisor
\*M. Morrow, Fire Protection Specialist
\*M. Floyd, Fire Protection Specialist
\*R. Connerly, Quality Assurance
\*D. Baur, Quality Assurance
\*J. Rudisell, Security
\*J. Powell, Security

Other licensee employees contacted included 3 shift foremen, 6 technicians, 12 operators, 6 mechanics, 10 security force members, and 5 office personnel.

NRC Resident Inspector

\*S. Weise

\*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on October  $^{+}9$ , 1980, with those persons indicated in paragraph 1 above. Licensee management responded to all items identified by the inspector and indicated similar interest and intent to investigate. The item of noncompliance was accepted with little comment.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. New unresolved items identified during this inspection are discussed in paragraph 8.

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#### 5. Plant Operations

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The inspector observed and reviewed plant operation to ascertain licensee conformance with applicable regulatory requirements and commitments.

The inspector reviewed the shift foreman log book, control operator log, auxiliary operator log and inoperable equipment reports to discern if recorded data was in sufficient detail to communicate equipment status and was properly reviewed by supervisory personnel.

The inspector toured selected portions of the auxiliary building, turbine building and control area. Observed instrumentation appeared to be operating and calibrated as required.

Selected valves, circuit breakers and control switches were verified to be properly aligned as required by technical specifications, applicable plant procedures, and plant status.

Control room operations were observed during all shifts and at shift changes. Interviews were held with twelve operators and three shift foremen in order to discern adequate operator cognizance of plant/plant modification status. Operator cognizance of plant/plant status is elaborated upon in paragraph eight of this report.

Within the areas inspected, no items on noncompliance or deviations were identified.

6. Surveillance Testing

The surveillance tests categorized below were analyzed and/or witnessed by the inspector to ascertain procedural and performance adequacy.

The completed test procedures examined were analyzed for embodiment of the necessary test prerequisites, preparations, instructions, acceptance criteria, and sufficiency of technical content.

The selected tests witnessed were examined to ascertain that current written approved procedures were available and in use, that test equipment in use was calibrated, that test prerequisites were met, system restoration completed and test results were adequate.

The selected procedures perused attested conformance with applicable Technical Specification and procedural requirements. They appeared to have received the required administrative review and were apparently performed within the surveillance frequency specified.

Title Test PT-1.1 Source, Intermediate and Power Range PT-1.4 Nuclear Instrumentation Comparator Channel Nuclear Instrumentation Startup Rate PT-1.5 Nuclear Instrumentation Audio Count Rate PT-1.6 PT-1.7 Power Range Calculation PT-2.7 Safety Injection System Reactor Coolant Low-Temperature Overpressure System PT-5.8 Test Boric Acid Heat Tracing Operability PT-7.3 PT-12.1 Radiation Monitoring System Battery Test PT-20.1 PT-23.1 **Emergency Diesels** Steam Generator Secondary Leak Test PT-32.1

The inspector employed one or more of the following acceptance criteria for evaluating the above items:

ANSI N18.7-1972

HBR Technical Specifications, HBR Administrative Procedures

No items of noncompliance or deviations were identified in this area.

7. Maintenance Witnessing

Extensive emergency diesel-generator maintenance was witnessed in order to verify that the maintenance activity was accomplished in accordance with current, written approved procedures and that the activity was accomplished by qualified personnel.

Post maintenance functional testing was also witnessed and was apparently perfomed in compliance with applicable requirements.

No items of noncompliance or deviations were identified in this area.

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# 8. Plant Modification Review

Selected modification packages, as delineated below, were reviewed in order to verify that the new or modified systems are installed in accordance with the approved design. This verification was based upon observation of the modification work, review of the related portions of the licensee's QA program as implemented, examination of installation records including material certification and other appropriate documentation.

Selected modifications were inspected on site to verify the completeness, quality and operability of the systems. The modifications inspected were in varying degrees of completeness; all less than finished. Of the systems/components examined, physical installation appeared adequate.

New or revised operating procedures relating to the modified systems were not completed at time of inspection and thus were not examined.

One area of the plant modification process requires further review. This area concerns the training provided for operators to familarize them with the operational ramifications associated with recently initated modifications. As stated previously, new or revised operating procedures relating to the current modifications were not completed. The operators had, at the time, of this report, received no formal training on the installed modifications. Two modifications installed last outage and operated subsequently, subcooling monitor and pressurizer pressure relief accoustical monitor, have no written, approved, operating up for startup at the end of this reporting period indicates that the administrative controls and/or processes associated with modification operations interface warrant expeditious review and/or revision.

The inspector interviewed several operators concerning past and current modifications. The results of the interviews reinforced the apparent need for a more disciplined, regimented, adequate administrative mechanism through which the operators are made aware of the modifications and operational changes.

<u>Modification</u>	Title
501	Subcooling Meter
502	Accoustical Monitor on Pressurizer Relief Valves
505	Auxiliary Feedwater Flow
515	Containment Volume Hydrogen Monitor
516	Stack Mid-Range Monitor



- 519 Containment Volume Pressure Monitor
- 520 Reactor Head Vent
- 525 Containment Volume Water Level
- 530 PORV Alarm

533 Steam Line Monitor

This area was discussed with licensee management during the exit interview. Licensee management responded by indicating that a review of this area will be performed to insure the adequacy of this process.

This area will be reviewed during subsequent inspections to further evaluate the adequacy of this process. This is an unresolved item 261/80-30-01.

9. Auxiliary Electrical Technical Specification

Review of H. B. Robinson auxiliary electrical technical specfication revealed no requirement for emergency electrical power when the unit is less than critical.

Selected safety-related systems are required to be operational during shutdown; for instance Residual Heat Removal.

With no requirement for emergency electrical power during shutdown conditions, the possibility exists for the inability of required safety-related system to function if offsite power were lost.

The inspector identified this item to the licensee during his exit interview. Licensee management replied that a review of the applicable technical specifications and system requirements will be conducted to determine if a Technical Specification is warranted.

This item will be reviewed during a subsequent inspection to review the adequacy of this Technical Specification. This is an open item. 261/80-30-02

### 10. Fire Protection

It was identified during routine unit inspection, that during the reporting period, October 1 through October 9, 1980 the carbon dioxide fire suppression system for both emergency diesel-generators and the halon fire suppression system for the electrical equipment rooms were disconnected rendering them completely inoperable.

Both A and B emergency diesel generators were run a number of times during the reporting period and the electrical equipment contained in the rooms referred to was energized. 111

A review of the H. B. Robinson fire protection Technical Specification revealed that fire protection for specified equipment is only required to be operable if the equipment it is protecting is required to be operable.

It appears from the above, that H. B. Robinson Tech Specs and/or administrative controls do not adequately address fire protection especially in the area of protecting safety related equipement during other than normal operating conditions.

The inspector identified this item to the licensee during the exit interview. Licensee management informed the inspector that during the periods normal fire protection equipment is unavailable, hand-held extinguishers or other compensatory measures could be taken to extinauish possible fires.

This area will be reviewed in subsequent inspections. This is open item 261/80-30-03.

11. Physical Security

During the reporting period implementation of the physical security program was observed and interviews were held with several members of the physical security organization. The areas inspected include, physical security organization, physical barriers, access and badge controls, pat down searches and communication checks. The guidance and acceptance criteria used for this inspection is provided in 10 CFR 73.55(b), (c), (d), (f) and (g), Regulatory Guide 5.20 and NUREG-0219.

Review of the physical security organization revealed the following:

- a. A member of the physical security organization who has the authority to direct the shift activities is to be present at all times. This was verified on October 4, 6 and 7, 1980.
- b. Security shift complement was verified on October 5, 7 and 8 and was determined to be adequately staffed.

Inspection on physical barriers consisted of walking the protected area fence on October 2 and 3 and observing that all gates were locked closed, and the isolation zone was free of objects. Within the building vital area door barriers were noted to be closed and locked. Throughout the reporting period it was noted that guards were posted at control room doors when the doors were malfunctioning.

Access control was checked each time the inspector entered the protected area. Persons and packages were observed being searched on October 5, 6 and 7. This review also included observation that all persons within the protected area properly displayed their identification badge.

No items of noncompliance were identified in this area of inspection.

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## 12. Housekeeping and Cleanliness Control

During routine inspections of the vital operating areas of the plant, the inspector observed considerable quantities of refuse, unused parts and/or equipment in areas of on-going open system maintenance and/or operational safety-related areas. Specifically, the inspector observed during tours of the containment building on October 6 and 7, 1980, that virtually the entire building, especially the lower levels and pump bays, were in a serious state of degraded cleanliness. A similar lack of cleanliness control was noted in the auxiliary feedwater pump room both during and after maintenance on that safety-related system.

Inspection of five energized electrical panels, including three control room control panels revealed small, loose, miscellaneous hardware inside, in locations from which it could fall into energized electrical components.

H. B. Robinson Maintenance Instruction MI-1 and ANSI-18.7-1980 to which MI-1 refers and to which CP&L is obligated through their QA plan, dictates that housekeeping be maintained during the performance of maintenance in order to protect the respective equipment, prevent introduction of foreign objects into open systems and provide a safe working area.

With emphasis placed on equipment/system reliability and safety, the inspector identified this item to licensee management during the exit interview. Licensee management stated they would inspect the areas discussed and resolve any problems encountered applicable to house-keeping and cleanliness.

This area will be reviewed during subsequent inspections in order to verify adequate cleanliness status. This is an open item 261/80-30-04.

### 13. Document Control

The administrative restraints established for drawing control were reviewed in order to verify that current as-built drawings, including P&ID's, will be provided to the appropriate site locations in a timely manner, obsolete drawings are controlled and/or disposed of in an adequate fashion, and discrepancies recognized in as-built drawings are sufficiently resolved.

The master file/index which specifies the current revision(s) for drawings, manuals, technical specifications and procedures was selectively reviewed for administrative adequacy.

Selected documents and drawings in the control room were verified to be current per the master file/index.

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The inspector noted that although the P&ID's and technical specifications on file in the control room were current both were in serious disrepair with pages missing, misfiled or illegible. The inspector identified this item to station management during the exit interview. Station management indicated that steps would be taken to resolve this issue but offered no action date. This area will be inspected during subsequent inspections for continued drawing control administration. This is an open item. (261/80-30-05)

14. Radioactive Waste Handling and Storage

On October 6, 7 and 8, 1980, the inspector witnessed handling, and storage of radioactive waste exterior to the east side of the auxiliary building. The inspector observed that no written approved procedure was employed in the observed manipulations.

Inquiry revealed a procedure does not exist which details the handling and/or storage of radioactive waste drums outside the auxiliary building.

H. B. Robinson Technical Specification 6.8.1 requires written procedures be established, implemented, and maintained which meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of Reg Guide 1.33 of November 3, 1972. Appendix "A" of Reg Guide 1.33 of November 3, 1972 section G., recommends that written approved procedures be implemented and maintained for "Drum Handling and Storage." ANSI 18.7-1972 section 5.3 indicates written approved procedures be implemented detailing the treatment and management of radioactive waste.

Furthermore, IE Bulletin 79-19 dictates in part that the licensee "provide management-approved, detailed instructions and operating procedures to all personnel involved in the transfer, packaging and transport of low-level radioactive material". This failure to have procedures required by Technical Specification 6.8.1 is an item of noncompliance. (261/80-30-06)