

303 USNRC REGION II
ATLANTA, GEORGIA

Carolina Power & Light Company

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

APR 4 9:40

APR 30 1981

Robinson File No: 2-0-4-a-4

Serial:RSEP/81-725

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/81-08

Dear Mr. O'Reilly:

We have received and reviewed the subject report and provide the following response.

Deviation From a Commitment To The NRC

CP&L Letter GD-79-3306, Lessons Learned Short Term Requirements, dated December 31, 1979, reported CP&L implementation of Requirement 2.1.3.a as clarified in Enclosure 1 of NRR letter dated October 30, 1979, Discussions of Lessons Learned Short Term Requirements. This letter reported the installation of an acoustic system to sense flow through each safety relief valve for valve position indication. This system was reported as using individual accelerometers for each safety relief valve and providing a low alarm function which indicates a loss of signal.

Contrary to the above, as of March 4, 1981 the safety relief valve position monitor was no longer installed as committed, in that, one valve has no accelerometer and the low noise alarm function is continuously alarmed on all channels due to a design deficiency.

Response

Carolina Power and Light Company acknowledges the above deviation.

The accelerometer which was not installed had been lost during the 1980 refueling when the safety relief valve to which the accelerometer had been attached was removed for testing. This was not considered a deviation from our commitment to provide safety relief valve position indication since backup

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indication was available through temperature and pressure measurements downstream of the valve. In addition, during the calibration of the Valve Monitoring System an impact on the pipe downstream of the unmonitored valve was detected on the valve monitors for the other safety relief valves. This suggested that flow noises from the unmonitored valve would also have been detected by the other safety relief valve monitors.

The low noise alarm indicates either a low background noise level at the accelerometer or an open circuit in the signal path. Initially the low noise alarm existed because there was insufficient background noise available to excite the accelerometers to the minimum level required to clear the alarm. This was verified by impacting the piping downstream of each safety relief valve and observing the resultant noise level increase at the valve monitoring panel in the Control Room. Although the low noise alarm did not in itself cause the failure of the Valve Monitoring System, it did mask the indication that a system failure did occur when the signal cables were inadvertently disconnected at a later date.

An investigation into the circumstances behind the disconnected cables did not identify any specific event which led to the actual disconnecting of the cables. The low noise alarm, which would have identified that a broken circuit existed, was already in alarm due to the low background noise. Therefore, the time frame in which the cables were disconnected could not be established. It is suspected; however, that the cables may have been inadvertently disconnected shortly after the system was calibrated but before startup after the refueling as part of a post outage cleanup effort. It was during this time period that some cables for a feedwater nozzle instrumentation program were being removed. These cables were in the same area as the disconnected safety relief valve monitor cables.

Immediate Corrective Action

A purchase requisition was initiated in October, 1980 to obtain two additional accelerometers - a replacement and a spare. The accelerometers were received during the week of March 30, 1981 with installation being completed during the week of April 13, 1981. The disconnected signal cables were discovered during the system calibration on April 17, 1981 and reconnected immediately. A complete system calibration was conducted and the Valve Monitoring System was placed back in service on April 18, 1981.

Corrective Action To Prevent Recurrence

The spare accelerometer will enable the timely replacement of a lost or damaged accelerometer in the future. In addition, a maintenance procedure will be revised to include special instructions for the control of the accelerometers while the primary safety relief valves are removed from the system. This procedure will be approved prior to the refueling outage currently scheduled for Fall, 1981.

The cables which were disconnected have been clearly labeled so that their identity will not be mistaken again.

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The manufacturer of the safety relief valve monitor is currently developing a field change to correct the low noise alarm deficiency. It is currently expected that the field change will be available for review at the H. B. Robinson Plant by the end of May, 1981 with installation being completed during the next refueling outage. Until the low noise alarm deficiency is corrected the circuit bias will be checked on a daily basis. The bias check will verify the operability of the Valve Monitoring System from the preamplifiers in containment to the readouts in the Control Room.

The proposed Technical Specifications for TMI related equipment have been submitted but as yet have not been approved. Without operability requirements there are no limits on equipment out-of-service time. This was a major factor in the events leading up to this deviation. In an effort to prevent recurrence of this type of deviation the TMI equipment will be placed on the H. B. Robinson Minimum Equipment List using the proposed Technical Specifications as a guideline for limiting conditions for operation (LCO). The above items will be complete by May 1, 1981 and will remain in effect until the proposed Technical Specifications are approved.

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

Very truly yours,

H.S. Zimmerman for

R. B. Starkey, Jr.
General Manager

H. B. Robinson S.E. Plant

H.S. Zimmerman for
R. B. Starkey, Jr.

, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

My commission expires:

Susan L. Andrews
Notary (Seal)

June 4, 1984

FG/tm

cc: V. Stello (1)