

November 18, 1981 NOV 23 AIO: 16

File: NG-3513(R)

Serial No.: NO-81-1899

Mr. James P. O'Reilly, Director
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, GA 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO I.E. INSPECTION REPORT NO. 50-261/81-27

Dear Mr. O'Reilly:

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

Severity Level IV Violation (IER-81-27-33)

Technical Specification 3.3.2.1 requires that the reactor not be made critical unless all essential features of the containment spray system are operable. Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained that meet or exceed the requirements of Section 5.3 of ANSI N18.7-1972. Section 5.3 of ANSI N18.7-1972 requires procedures for post-maintenance checkout and return to service of safety-related equipment and requires that operating personnel place the equipment in operation and verify and document its functional acceptability.

Contrary to the above, as of September 1, 1981, procedures for post-maintenance checkout and return to service of safety-related equipment were not implemented, resulting in power operation of the reactor without having demonstrated the operability of "B" containment spray flowpath following maintenance on Check Valve SIS-890B.

Admission or Denial of the Alleged Violation

Carolina Power & Light Company acknowledges the above violation as identified by the licensee and reported to the NRC in LER 81-20.

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Reasons for the Violation

On September 2, 1981, at 1310 hours with the unit at 25% power, a review of the Local Clearance and Test Request (LCTR) Log revealed that post-maintenance testing of Containment Spray Header Check Valve SI-890B had not been completed prior to reactor criticality at 2244 hours, September 1, 1981. The "B" Containment Spray flow path, which includes SI-890B, was therefore declared inoperable at 1310 hours on September 2, 1981.

Investigation of this event revealed that valve SI-890B was removed from service on August 5, 1981 on LCTR #872 in response to Work Request OP-500. SI-890B was disassembled, inspected, cleaned and re-assembled. Upon completion of this maintenance, the clearance portion of LCTR #872 was cancelled, and the LCTR was placed in the "Awaiting Testing" section of the LCTR Log Book. The LCTR log was reviewed on September 1, 1980 as a routine operating practice. However, due to oversight, LCTR #872 on "B" Containment Spray flow path was missed. This review was not intended to specifically identify safety related equipment requiring post-maintenance testing prior to startup. This specific review of the LCTR log was not previously required prior to startup.

Since the required post-maintenance testing was not performed, "B" Containment Spray flow path was declared inoperable which resulted in a degraded mode of operation permitted by Technical Specification 3.3.2.2.c which was reportable pursuant to 6.9.2.b.2. The redundant train was operable during the period that "B" flow path was declared inoperable. Therefore, there was no threat to the public health and safety.

Corrective Steps Taken and Results Achieved

Upon declaring SI-890B and "B" Containment Spray flow path inoperable, Periodic Test 42.0 was initiated. PT-42.0 was completed satisfactorily and the flow path, including SI-890B, was declared operable at 2021 hours on September 2, 1981.

Corrective Steps Taken to Avoid Future Violations

A statement requiring review of the LCTR log specifically for "Satisfactory Completion of All Testing Requirements on Limiting Conditions for Operation Equipment" has been added to the instructions of General Procedures 2, 3A, and 3B. This provides additional emphasis to the review previously performed and insures that post-maintenance testing required prior to plant startup is completed.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Should you have any questions regarding this response, please contact a member of my staff.

Yours very truly,



B. J. Furr
Vice President
Nuclear Operations

DCW/lr (0572)

B. J. Furr, 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.


Notary Public

My commission expires:

My Commission Expires 6-8-86