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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME: UTLEY, E. E. AUTHOR AFFILIATION: Carolina Power & Light Co.
 RECIP. NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Operating Reactors

SUBJECT: Responds to 790921 request for review of surveillance testing & multiple equipment failures. Existing procedures adequate.

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Carolina Power & Light Company

November 7, 1979

FILE: NG-3514 (R)

SERIAL NO.: GD-79-2856

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D.C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

LICENSE NO. DPR-23

MULTIPLE EQUIPMENT FAILURES AND SURVEILLANCE TESTING ERRORS

Dear Mr. Eisenhut:

On September 21, 1979, you sent a letter to all Pressurized Water Reactors requesting reviews of plant surveillance testing and the occurrence of multiple failures. Since receiving your letter on October 8, 1979, Carolina Power & Light Company (CP&L) has taken the following action:

The events related in the subject letter were reviewed and an evaluation was made as to the probability of a similar occurrence at H. B. Robinson. This evaluation consisted of a review of all reactor trips since the start of commercial operation (1971) in an effort to identify surveillance testing errors which may have caused each trip. Additionally, the potential for multiple equipment failures associated with surveillance testing at Robinson was evaluated.

In the above evaluation, all reactor trips which have occurred over the eight years of commercial operation were analyzed to determine the number that could be related to surveillance testing errors. Approximately 3546 surveillance tests were performed in that period that had the potential of causing a reactor trip. Of these, only ten could be related to an inadvertent reactor trip. This results in a 99.7% overall performance factor for proper performance of periodic tests which have been conducted. In addition, H. B. Robinson's Engineered Safety System Surveillance Procedures have undergone extensive review and revision in the recent past in connection with such items as IE Inspections, IE Bulletins, Corporate Quality Assurance audits, the Three Mile Island (TMI) incident followup and our own initiated reviews. As a result of these reviews the procedures are considered adequate in providing the appropriate cautions to ensure that plant personnel are aware of the importance of avoiding challenges to the protective features of the plant. The low number of reactor trips which have occurred associated with surveillance testing reaffirms this conclusion.

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With regard to multiple equipment failures, the plant's Final Safety Analysis Report (FSAR) requires that the engineered safety systems provide sufficient performance capability to accommodate the failure of any single active component without resulting in an undue risk to the health and safety of the public. The plant's Technical Specifications specify for those systems the surveillance testing requirements and the frequency of tests to assure that the FSAR's safety criteria are satisfied. These requirements are designed to preclude multiple equipment failures from negating the criteria assumed in our previous accident analyses or which could lead to an overall reduction in these systems' reliability.

In addition to the above review, CP&L reviewed its management policies and found them adequate to assure that multiple equipment failures in safety-related systems would be vigorously pursued and analyzed to identify potential failure modes not previously considered that could lead to a significant reduction in the ability of safety systems to function as required. Under present policies and procedures concerning this subject matter, Licensee Event Reports (LER's) are submitted in accordance with Plant Technical Specifications and followed up as required to prevent further occurrence. Additionally, Corporate and Plant procedures are now being implemented to assure that evaluations are made such that if a substantial safety hazard could exist and the defect or failure to comply is not reportable as an LER, a 10 CFR 21 report and appropriate followup action is initiated.

The Robinson plant has operated for eight years with a very low percentage of reactor trips associated with surveillance testing errors. In addition, no problem concerning multiple equipment failures was found connected with these trips that would invalidate our FSAR findings. Therefore, no further action on this matter, other than as outlined above, is considered necessary by CP&L.

If you have any further questions on this subject, please contact our staff.

Yours very truly,



E. E. Utley

Executive Vice President
Power Supply & Customer Services

EEU/jcb

Sworn to and subscribed before me this 7th day of November, 1979.

Franklin Murray
Notary Public

My Commission expires October 4, 1979.

cc: Mr. J. D. Neighbors (NRC)

