CP&L
Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA
80 FEB 11 P2:59

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

February 5, 1980

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

SERIAL:RSEP/80-164

Mr. James P. O'Reilly
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
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. 50-261/79-29

Dear Mr. O'Reilly:

We have reviewed the subject report and are hereby responding to the deviation as requested.

Enforcement Item

Deviation

Item E.2.a of Table 4-1 in Section 4.0 of the licensee's Fire Protection Program Review-APCSB 9.5.1, H. B. Robinson Unit No. 2, states that the underground yard fire protection water main complies with National Fire Protection Association Standard No. 24 (NFPA-24), "Outside Protection". Section 3-3.1 of NFPA-24 requires every connection from a yard main to a building to be equipped with a post indicator type valve. Section 3-5.1 of NFPA-24 requires large yard main systems to be provided with sectional controlling valves at appropriate points.

Contrary to the above, the yard main connection to the auxiliary building interior fire hose (standpipe) system is not provided with a post indicator valve and a post indicator type sectional control valve is not provided for the northeast portion of the fire protection water main loop. These valves were to be installed as part of the plant's fire protection modifications and were indicated on construction drawing No. 5137M2017R1. However, due to installation difficulties, the licensee's construction division initiated a

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Field Change Request (FCR) to delete these two valves and install an indicating type valve inside the auxiliary building. This FCR was disapproved by the licensee's engineering division but the change was actually made. This change resulted in an installation which does not meet the provisions of NFPA-24. Also, a non-indicating type valve was installed within the auxiliary building in lieu of an indicating type valve and does not conform to the NFPA requirements. This nonconforming valve is included as part of this deviation.

Response

Corrective Action

The non-indicating valve inside the auxiliary building was locked open and the appropriate operating procedure was revised to reflect this requirement. On December 19, 1979, a Design Change Notice (DCN-240) was issued by the Architect Engineer and approved by the plant to delete the installation of outside post indicator valves and approve the installation of an indicating type isolation valve on the hose standpipe inside the auxiliary building. This type of installation is permitted by Sections 3301 and 3501 of NFPA-24. The existing non-indicating valve will be replaced by a qualified indicating valve during the 1980 Unit No. 2 refueling outage.

Extensive review by CP&L and the NRC during inspection 79-29 indicated that this was an isolated incident and that all other equipment installed as part of the fire protection modification met all the appropriate standards and was installed to approved specifications and procedures.

Discussion

The installation of an indicating valve on the fire water riser inside the auxiliary building had been verbally agreed upon by all CP&L parties involved, including plant management during the Unit No. 2 1979 refueling outage. This agreement was addressed in internal CP&L memoranda. However, a Field Change Request (FCR) which was issued to approve the installation was disapproved by the contract engineering organization responsible for the modifications to the fire water system based on the contention that the installation was not allowed by NFPA-24. The matter then went into a review and resolution phase to determine whether or not the installation was allowable. In the meantime, an FCR was issued to purchase a non-indicating type valve for installation in the fire water line and, due to an oversight, the FCR was approved by plant management. Subsequently, based on the approved procurement FCR and the verbal agreement mentioned previously, the non-indicating valve was installed. During this period the active review of the installation FCR had inadvertently stopped. Upon identification of the erroneous information, the actions described in the "Corrective Action" section of this letter were taken.

Corrective Action To Prevent Further Non-Compliance

All parties involved with this modification have been made aware of the incident and have been cautioned to ensure that no modifications are performed on plant systems without proper approval in accordance with established plant procedures. In addition, those responsible for initiation of the purchase have been cautioned to ensure that any equipment purchased meet all the applicable codes and standards put forth in the appropriate modification documentation. Furthermore, all procurement documents for equipment not purchased to an approved modification specification will be thoroughly reviewed for conformance to all the applicable codes and standards prior to approval by the plant.

Date When Full Compliance Will Be Achieved

The action to prevent further non-compliance was completed by December 31, 1979, and the non-indicating valve will be replaced, as stated above, prior to startup following the 1980 refueling outage.

We believe the corrective action described will adequately resolve this deviation.

If there are any questions concerning this response, please contact me.

Very truly yours,

R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

SBC:pb

cc: V. Stello (1)