CP&L

Carolina Power & Light Company

APR 23 1982

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT 82-08

Dear Mr. O'Reilly:

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

Severity Level IV Violation (IER-82-08-01)

Technical Specification 6.8.1 in concert with ANSI N18.7-1982, Paragraph 5.3.7, requires appropriate evaluation of test results.

Contrary to the above, appropriate evaluation of the results of measurement of reactor coolant system leakage could not be assured in that in PT-8, "Reactor Coolant System Evaluation", the constant used to equate volumetric change with a change in average system temperature was based upon an incorrect system volume. Further, the constant was not calculated for current operating conditions or sufficiently universal to all modes for which surveillance is required.

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the above Violation.

2. Reason for the Alleged Violation

Periodic Test (PT) No. 8.0, "Reactor Coolant System Leakage Evaluation", had been written to allow a simple, straight forward calculation of Reactor Coolant System (RCS) leakage. Recognizing that a minor change in RCS Average Temperature (T_{avg}) during the performance of the PT could mask the actual RCS leakage or could artificially increase the calculated RCS leakage, a T_{avg} change correction factor was included in the calculation. In keeping with the desire to keep the PT simple, a single correction factor, calculated for power operation at which the majority of the leakage calculations are performed, was selected. In addition,

when the T_{avg} Program was modified in November, 1981, the plant staff did not recognize the need to revise this correction factor in PT-8.0. The solid volume of the pressurizer was apparently erroneously included in the original calculation of the correction factor.

3. Corrective Steps That Have Been Taken and Results Achieved

Since the maximum error induced by the T_{avg} correction factor was less than 0.1 gallons per minute for the several RCS leakage tests reviewed by the Inspector and since the unit was shutdown for a refueling outage shortly after the inspection, no immediate corrective action was necessary.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

The T_{avg} correction will be deleted from PT-8.0, and the initial and final values of T_{avg} will be required to be the same. Thus, T_{avg} change will not affect the results of the test. The proper volume of the Reactor Coolant System will be included.

5. Date When Full Compliance Will Be Achieved

The above changes to PT-8.0 will be approved prior to startup following the completion of the current refueling outage.

Yours very truly,

B. J. Furr
Vice President
Nuclear Operations

CLW/DCW/lr (n-32)

cc: Mr. G. Requa (NRR)