CP&L

Carolina Power & Light Company

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H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

APR 30 1982

File No: 13510E

Serial: RSEP/82-809

Mr. James P. O'Reilly
Regional Administrator
USNRC Region II
101 Marietta Street, N. W.
Suite 3100
Atlanta, Georgia 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. 82-07

Dear Mr. O'Reilly:

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

A. Severity Level V Violation - IER-82-07-01

Technical Specification 4.5.2.6 requires that the refueling water storage tank (RWST) outlet valves shall be tested at each cold shutdown which extends more than 48 hours but not more often than once each quarter. These valves were last tested May 19, 1982.

Contrary to the above, the plant was placed in the cold shutdown mode for greater than 48 hours during August and November, 1981, but the RWST outlet valves were not tested.

1. Admission or Denial of Alleged Violation

Carolina Power and Light acknowledges the above violation.

2. Reason for the Alleged Violation

The RWST outlet valves were included in the inservice inspection (ISI) Periodic Test (PT) 42. PT-42 is required to be completed during each refueling outage and to be started, but not necessarily completed, during each cold shutdown which exceeds 48 hours.

PT-42 did not specifically address the Technical Specification requirement to ensure that the RWST outlet valves were cycled quarterly if a cold shutdown exceeding 48 hours occurred in the quarter.

3. Corrective Steps Which Has Been Taken and Results Achieved

Since the unit was operating at power during and following this inspection, the RWST outlet valves could not be immediately tested.

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

PT-2.13 was implemented on March 23, 1982. This PT includes the RWST outlet valves and satisfies the testing requirements of Technical Specification 4.5.2.6. PT-2.13 was included in the Plant's heatup and cooldown procedures to ensure it is performed during cold shutdown, if required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 23, 1982.

B. Severity Level V Violation - IER-82-07-02

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33 dated November 3, 1972. This Regulatory Guide requires implementing adequate procedures for Containment Leak Rate Tests. Special Procedure-361 was written and approved to conduct the Containment Integrated Leak Rate Test (CILRT), including valve lineups to meet 10CFR50, Appendix J test requirements.

Contrary to the above, as of March 4, 1982, adequate procedures had not been established or implemented for the CILRT, resulting in the nitrogen supply to accumulators, regulator (PCV-846), not being shut, the nitrogen supply to accumulators pressure indicator not being removed and the accumulator sample isolation valve (PS-989E) not being open.

These items resulted in about 1080 psig pressure being applied to the nitrogen supply to accumulators containment isolation valve (SI-855), which is contrary to Special Procedure-361, Prerequisite 5.27.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light acknowledges the above violation.

2. Reason For the Alleged Violation

The contractor that wrote the ILRT procedure used features in the accompaning valve lineup to which the Operations personnel were not accustomed. This contributed to an operator performing the lineup on the nitrogen supply to the pressurizer relief valve (supply valves shut and pressure indicator removed) but mistakenly signing off a similar step for the nitrogen supply to the accumulators. Thus the nitrogen supply to the accumulator was not properly aligned.

The normally open accumulator sample isolation valve (PS-989E) was verified open and signed off in the valve lineup. There has been no explanation as to why this valve was later found shut.

As stated in Inspection Report 82-09, "These items did not affect the ILRT leak rate results since they were corrected prior to the second 24 hour leak rate test".

3. Corrective Steps Which Have Been Taken and Results Achieved

To ensure future procedures are prepared in a consistent format, a Procedure Format and Preparation Administrative Instruction was approved on March 31, 1982.

The Unit 2 Operating Supervisor discussed this occurrence with both the operator who improperly signed off the ILRT valve lineup to ensure he understood the seriousness of his oversight, and the operator who verified the position of the accumulator sample isolation valve to emphasize the importance of accurate valve lineups.

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

The immediate corrective actions taken were thorough and complete. No additional corrective actions are planned.

5. Date When Full Compliance Will Be Achieved

Full compliance has been completed as of this date.

If you have any questions concerning this response, please contact me.

Very truly yours,

R. B. Starkey, Jr.
General Manager
H. B. Robinson SEG Plant

CW/bs

cc: R. C. DeYoung