



Carolina Power & Light Company

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

JAN 2 1 1983

Robinson File No: 13510E

Serial: RSEP/83-83

Mr. James P. O'Reilly  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
RESPONSE TO NRC INSPECTION REPORT 82-37

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 IV Violation - IER-82-37-13-SL4

Technical Specification 6.5.1.1.1 requires that procedures be established and implemented which meet the recommendations of Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A requires equipment control and protection procedures for operations and maintenance affecting safety-related equipment. Administrative Instructions 11.6 and 4.1, Operating Procedure-7A, and Standing Order-9 implement these requirements. FSAR Section 1.3.4 states that the air start supply is independent for each emergency diesel generator.

Contrary to the above, as of November 9, 1982, these procedures had not been adequately established or implemented, in that the diesel generator air start air receiver discharge crossconnect valve was left open following activities associated with the "B" emergency diesel generator air compressor.

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Response

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

The diesel generator air receiver discharge crossconnect valve was usually controlled at the Auxiliary Operator (AO) level using the AO logs as the controlling document. DG-AS-10 was not included on an Operating Work Procedure and, therefore, would not have been included on a clearance of either air compressor/receiver. When either diesel generator air compressors or either air receiver were made inoperable, the Auxiliary Operator opened DG-AS-10 to provide starting air to both diesels and recorded his action into the AO shift log. In this particular event, an entry on opening valve DG-AS-10 was not made in the AO shift log. The valve had probably been opened a few days earlier when maintenance was performed on "B" emergency diesel air compressor and DG-AS-10 was inadvertently left open following this maintenance.

3. Corrective Steps Taken and Results Achieved

Valve DG-AS-10 was closed immediately as directed by the Shift Foreman. Operations personnel were interviewed to determine why the valve was open. It could not be determined by these interviews why valve DG-AS-10 was opened.

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

Operating Work Procedures on equipment associated with this valve DG-AS-10 are being revised, as necessary, to include DG-AS-10. This will ensure positive control of DG-AS-10 and will properly document its repositioning for maintenance.

The importance of properly documenting the repositioning of safety-related equipment will be discussed with the Auxiliary Operators.

5. Date When Full Compliance Will Be Achieved

Discussions with the Auxiliary Operators will be completed by February 28, 1983. The appropriate OWPs will be revised by April 30, 1983.

B. Severity Level V Violation - IER-82-37-02-SL5

Technical Specification Table 3.5-5, Item 2, requires that a special report be submitted if one or more of the direct auxiliary feedwater flow indicators becomes inoperable for more than seven days when the reactor coolant system temperature is above 350°F.

Contrary to the above, as of October 25, 1982, special reports had not been submitted for three instances of auxiliary feedwater flow indication inoperability occurring in September and October, 1982.

Response

Carolina Power and Light Company acknowledges the alleged violation. The items CP&L would discuss in a response to this violation have been discussed in "Special Report - AFW Flow Indication" submitted to your office on December 16, 1982. Please refer to this Special Report for the necessary information.

Deviation - IER-82-37-07-DEV

CP&L letter GD-28-231, Reactor Vessel Overpressure Protection Request for License Amendment, dated January 25, 1978, committed to installation of a low pressure alarm on the backup nitrogen system for the low temperature overpressure protection system.

Contrary to the above, as of November 1, 1982, a low pressure alarm had not been installed on the backup nitrogen system.

Response

1. Corrective Actions That Will Be Taken

A low pressure alarm on the backup nitrogen system for the low temperature overpressure protection system will be installed during the next refueling outage presently scheduled to begin in early 1984.

2. Corrective Actions Taken to Avoid Further Deviation

A review of past correspondence from CP&L to the NRC has been initiated to verify that no additional commitments were missed. A system to audit regulatory commitments has been initiated by the Quality Assurance Group and the Corporate Nuclear Safety Group on site.

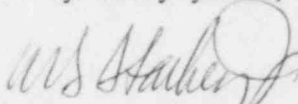
3. Date When Corrective Action Will Be Completed

The N<sub>2</sub> low pressure alarm will be installed during the next refueling outage.

The review of past NRC correspondence is presently expected to be completed by July, 1983. However, the total extent of this review will be determined by the review itself. If additional problems are identified, then the scope of the review will be expanded.

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

Very truly yours,



R. B. Starkey, Jr.

General Manager

H. B. Robinson SEG Plant

CLW:FMG:JMC/bss

cc: R. C. DeYoung