

USNRC REGION II
ATLANTA, GEORGIA

CP&L

Carolina Power & Light Company

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

OCT 8 1982

Robinson File No: 13510E

Serial: RSEP/82-1665

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
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 IE INSPECTION REPORT NO. 82-27

Dear Mr. O'Reilly:

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

A. IER-82-27-02-SL4

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements of Appendix A of USNRC Regulatory Guide 1.33 Revision 2. Paragraph 1.d of Appendix A requires administrative procedures for procedure adherence. Corporate Quality Assurance Program Section 6 implements this requirement by requiring that superseded procedures be controlled to prevent their use. Robinson Administrative Instructions Section 5.0 and Operating Note 89 implement these requirements for operating procedures.

Contrary to the above, as of July 12, 1982, procedures had not been implemented to prevent use of superseded documents resulting in the use of superseded valve lineups for the Reactor Coolant System, Component Cooling Water System, and the Instrument and Station Air System.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light acknowledges the alleged violation.

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2. Reason for the Violation

The subject valve lineups were included on the Operations Revision Status List which is used to ensure a procedure is indeed the latest approved revision. The following problems in the use of the Revision Status List were found to have caused the violation.

- a. Document Control maintains a "Permanent Change Book" that is used weekly to update the Operations Revision Status List. However, procedures that were approved through the modification approval process were not included in the Permanent Change Book but instead were included on a separate list that was not reviewed when updating the Operations Revision Status List. This resulted in errors in the Operations Revision Status List which led to the use of the superseded Reactor Coolant System Valve Lineup.
- b. Valve lineups available for use in the Control Room were not updated within a specified time period because approved valve lineups were not assigned an effective date. In addition, valve lineups were not thoroughly purged in the Control Room when a new revision was included in the files. Thus, if a valve lineup was used without verifying its revision number against the number in the Revision Status List, a potential existed for an outdated revision to be used as was the case with the use of the superseded Component Cooling and Instrument and Station Air Valve line-ups.

3. Corrective Steps Which Have Been Taken

- a. All changes to the Plant Operating Manual, including those approved through the modification procedure, are included in the Permanent Change Book. This will ensure that all changes to valve lineups will be reviewed and included on the Operations Revision Status List.
- b. The Operations Revision Status List is now updated twice weekly and delivered to the Control Room the same day.
- c. The procedure change form has been revised to include a specified effective date.
- d. Whenever a new Operations Revision Status List is placed in the Control Room, all old valve lineup revisions are removed.
- e. Each of the superseded valve lineups have been rerun with up-to-date revisions. It is to be noted that no safety implications resulted from operation of the plant using the superseded valve lineups.

4. Corrective Steps Which Will Be Taken To Prevent Further Violations

A method to provide documentation that each Operations valve lineup used is verified to be current per the Operations Revision Status List has been developed. In addition, a review of the usage of current procedures in all areas of the plant is being made to determine if the above mentioned corrective steps also apply or if different steps may be necessary.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved. The above mentioned review and necessary corrective steps will be completed by November 22, 1982.

B. IER-82-27-03-SL4

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements and recommendations of Section 5.2 and 5.3 of ANSI N18.7-1976. Section 5.2.15 of ANSI N18.7 requires that administrative controls and the quality assurance program shall provide measures to assure that procedures affecting safety-related systems are adequately reviewed prior to approval and release for use. These requirements are implemented by Section 3.0 and 5.0 of the plant Administrative Instructions.

Contrary to the above, as of July 13, 1982, adequate review procedures had not been implemented for Maintenance Procedure MP1-10, used for safety-related instrument valve lineups. Procedure MP1-10 was inadequate in that it did not specify isolation valve configuration in a manner conducive by operating procedures. Use of procedure MP1-10 resulted in the mispositioning of containment spray valve SI-892D.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light acknowledges the alleged violation.

2. Reason for the Violation

During a review of the Drawing Control Program it became apparent that a lineup of instrument valves following a Refueling Outage would benefit the plant. Therefore, it was decided that I/C Technicians would line up all safety-related instrument block valves that are on ΔP instruments. All other safety-related instrument isolation and vent/drain valves would continue to be lined up by Operations personnel. Due to the short time frame in which this procedure was developed, the instrument lineup, MP1-10, was not reviewed in sufficient detail to identify that the scope of the instrument valve lineup mistakenly included all flow sensing transmitters. It should have been limited specifically to ΔP instruments with valve blocks. Because rotameters have transmitters, they were inadvertently included on the instrument

valve lineup. The lineup sheet included only a listing of the instruments and not the specific valves to be lined up. A general statement on the proper lineup of typical instrument blocks was included. The error occurred when the Technician lined up an isolation valve to a rotameter, even though it did not have a valve block, because the rotameter instrument was included on his lineup sheet. An insufficient review of the instrument valve lineup prior to its approval was the cause of this violation.

3. Corrective Steps Which Have Been Taken

The instrument lineup was rerun with verbal instructions to identify each instrument that was not a ΔP transmitter to verify that additional errors did not exist. A Senior Reactor Operator was assigned to accompany the Technician to verify the instrument lineup and to realign any other valves found mispositioned. Although several other rotameters were identified on the lineup, no other misaligned valves were found.

4. Corrective Steps Which Have Been Taken to Prevent Further Violation

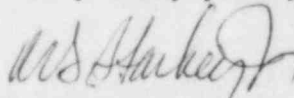
The instrument valve lineup procedure will be re-written prior to its next use. The specific type of instrument block that applies to each instrument will be included in the re-write. Recent revisions to the Technical Specifications in the area of Administrative Controls and to the procedure change form should ensure that procedure changes receive adequate review to prevent a recurrence of this violation.

5. Date When Full Compliance Will Be Achieved

A revised instrument lineup will be approved prior to use or by February 15, 1983.

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