

# CP&L

USNRC REGION II  
ATLANTA, GEORGIA

Carolina Power & Light Company

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H. B. ROBINSON STEAM ELECTRIC PLANT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550  
MAR 4 1983

Robinson File No: 13510E

Serial: RSEP/83-286

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 82-42

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-82-42-02-SL4)

Technical Specification 3.1.2.d requires that the overpressure protection system be operable whenever Reactor Coolant System (RCS) temperature is below 350<sup>o</sup>F and the RCS is not vented to containment.

Contrary to the above, as of December 12, 1982, the overpressure protection system has not met operability requirements since system installation in 1978, due to a non-conservative pressure transmitter calibration error affecting both trains of protection. As a result, the overpressure protection system was incapable of meeting its design basis requirements during all periods of required operability.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

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2. Reason for the Violation

In 1978, when the Low Temperature Overpressure Protection (LTOP) system was installed, an incorrect value was assigned to the "zero adjust" which compensates for the reference leg height in the calibration of the LTOP pressure transmitters. Since the narrow range pressurizer pressure transmitter and the LTOP pressure transmitter use the same pressurizer reference leg, it was erroneously assumed that the narrow range "zero adjust" could be used for the LTOP "zero adjust." This resulted in a non-conservatively low bias on the LTOP pressure transmitters.

3. Corrective Steps Which Have Been Taken and Results Achieved

The LTOP pressure transmitters have been properly calibrated, and their calibration sheets, which are now controlled in the Plant Operating Manual (POM), have been corrected.

The modification control procedure was reorganized in 1982 and now requires that the calibration sheets be implemented into the POM as part of the modification process.

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

All safety-related instruments that have been added to or altered by modifications will be reviewed to ensure that the appropriate information is contained on their respective calibration sheet in the Plant Operating Manual.

5. Date When Full Compliance Will Be Achieved

The appropriate instruments will be identified by August 1, 1983. The review of calibration sheets for the identified instruments should be completed within two months following the identification of the instruments.

B. Severity Level IV Violation (IER-82-42-03-SL5)

Technical Specification 6.5.1.1.1 requires that procedures be established, implemented, and maintained meeting the requirements of Appendix A of Regulatory Guide 1.33, Revision 2 and addressing surveillance and test activities of safety-related equipment. Maintenance Instruction-4, Calibration Program, implements these requirements for calibration of the pressure transmitters required for proper operation of the low temperature overpressure protection system.

Contrary to the above, as of December 12, 1982, adequate procedures had not been established controlling the calibration of the low temperature overpressure protection system pressure transmitters in that the zero adjustment was incorrectly specified, resulting in transmitter output being non-conservatively low.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

The reason for this violation and the corrective steps taken and to be taken are identified as those stated in the response to Violation "A" above.

C. Severity Level V Violation (IER-82-42-0-SL5)

Technical Specification 6.5.1.1.1 requires that procedures be implemented which meet the requirements of Appendix A to Regulatory Guide 1.33, Revision 2. Administrative Instructions Section 5 and Engineering Procedure 5.0 implement these requirements with respect to procedural compliance and plant modification control and require that modification implementing procedures be followed or appropriately revised and reviewed.

Contrary to the above, during periods of fuel movement on December 26-28, 1982, these procedures had not been implemented in that the following requirements of Modification 633, Attachment 17, Fuel Shuffle Procedure, were not met:

- (1) The spent fuel pit water level was less than the minimum allowed.
- (2) The boron dip samples were not being performed.
- (3) The Fuel Handling Procedure 3.0, Table 3.4 log sheet was not utilized to record appropriate spent fuel pit parameters.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

Fuel Handling procedure FT-3 is used by Operations to move fuel during refueling outages. Because FT-3 contained the information necessary to ensure a safe fuel shuffle, FT-3 was referenced in Attachment 17 to

Modification 633. FT-3 contained some steps that would be unique to fuel movement only during refueling outages and not during this modification. These were steps such as:

- (1) referring to the SRO and manipulator operator in containment,
- (2) the handling of polyethylene wrappers on new fuel in the new fuel handling building, and
- (3) the use of checkoff sheets that covered both the containment and the spent fuel pit (SFP).

However, Modification 633 failed to delineate which portions of the FT-3 were applicable. Therefore, only those conditions in FT-3 believed by those performing this operation to be pertinent to the fuel movement in the SFP, were observed and adhered to as per the reference in Attachment 17 of Modification 633. It was believed that the pertinent steps in FT-3 had been followed and that the three steps cited in the violation were not pertinent and, therefore, did not necessarily apply to Attachment 17 of Modification 633.

3. Corrective Steps Which Have Been Taken and Results Achieved

Movement of Spent Fuel in the SFP was stopped until a special procedure (SP-456) was implemented which included all necessary requirements of the fuel shuffle without referencing other procedures. SP-456 included a required SFP level, SFP boron samples, and checkoff list, which included appropriate SFP parameters.

In the performance of SP-456, a personnel error in procedural compliance resulted in a discrepancy of the documented SFP level. This resulted in disciplinary action with the individual involved. In addition, the Manager of Operations & Maintenance met with each operating shift to emphasize the necessity of procedural compliance and the importance of quality operation.

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

The steps described above should prevent further violation of not strictly adhering to referenced procedures.

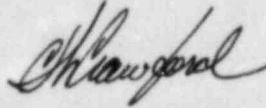
5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

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

Very truly yours,



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

CLW:FMG:JMG/bs

cc: R. C. DeYoung