



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
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HARTSVILLE, SOUTH CAROLINA 29550

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Robinson File No: 13510E

Serial: RSEP/83-153

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 82-41

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 (LER-82-41-06-SC5)

License Condition Paragraph 3.G requires that a secondary water chemistry monitoring program be established and implemented which includes procedures identifying corrective actions required to return secondary chemistry to its normal band following an out of control band condition.

Contrary to the above, as of December 2, 1982, procedures had not been established which define the corrective actions required for common potential out of control band secondary chemistry events.

Response:

1. Admission or Denial of the Alleged Violation.

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation.

Chemistry Procedure CP-1, Chemistry Monitoring Program, was implemented as a direct result of the interpretation of the requirement in paragraph 3.G of the Operating License. However, in discussion with the NRC, it has been concluded that procedures, in addition to CP-1, describing specific detailed corrective actions are necessary to meet the intent of paragraph 3.G of the Operating License.

3. Corrective Steps Which Have Been Taken and Results Achieved.

The procedures that will be required to resolve the concern of this violation are under development. Additional guidance given to the appropriate technician should be adequate to ensure secondary chemistry corrective actions will be taken prior to the implementation of the procedure.

4. Corrective Steps Which Will be Taken to Avoid Further Violations.

Secondary Chemistry Corrective Action procedures will be fully implemented by June 1, 1983.

5. Date When Full Compliance Will be Achieved.

Full compliance will be achieved by June 1, 1983.

B. Severity Level IV Violation (LER-82-41-04-SC4)

10CFR50, Appendix B, Criterion 16 requires that measures shall be established to assure that significant conditions adverse to quality are promptly identified and corrected, including determination of the cause of the condition and action to prevent recurrence. This requirement is implemented by Corporate Quality Assurance Program Section 15 and Plant Administrative Instructions 12 and 15 concerning licensee event reporting. Licensee Event Report 81-34 documented corrective action to prevent recurrence of inoperability of safety-related equipment due to inadequate freeze protection maintenance controls.

Contrary to the above, as of November 18, 1982, adequate corrective actions to prevent recurrence had not been implemented in that maintenance work on freeze protection circuitry was performed without using the required equipment controls of Administrative Instruction 11.6.

Response:

1. Admission or Denial of the Alleged Violation.

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Alleged Violation.

As the corrective action to LER-81-34, a memorandum discussing the required use of the Local Clearance and Test Requests (LCTRs) procedure on freeze protection circuits was issued to maintenance personnel. However, this information was not discussed with the Plant operators. Prior to LER-81-34, work on freeze protection circuitry was normally performed without a LCTR. When the maintenance technicians requested a LCTR for work on freeze protection following the LER-81-34 response, he was advised by the more experienced operator that a LCTR was not necessary for the work. The operator's position was followed.

3. Corrective Steps Which Have Been Taken and Results Achieved.

LCTRs are now used on freeze protection circuitry. The Operations Shift Foremen have been directed to issue LCTRs on all work that de-energizes freeze protection. It has been re-emphasized to all appropriate maintenance personnel that a LCTR is required for work on freeze protection circuitry. A revision to Administrative Instruction 11.6, use of LCTRs, was approved on January 28, 1983, to include the freeze protection system as operational systems that require the use of LCTRs.

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

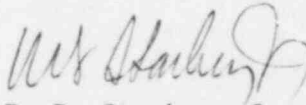
The above revision to AI-11.6 will be reviewed by appropriate operations and maintenance personnel. A follow-up audit program on LER responses has been initiated to ensure that the stated corrective actions are in fact implemented.

5. Date When Full Compliance Will be Achieved.

Full compliance has been achieved with the use of LCTRs on all freeze protection circuits. The above revision to AI-11.6 will be reviewed by the appropriate personnel by March 31, 1983.

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 S. E. Plant

CLW:FMG:JMC/th

cc: R. C. DeYoung