



Carolina Power & Light Company

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

AUG 24 1983

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USNRC REGION II
ATLANTA, GEORGIA

Robinson File No: 13510E

Serial: RSEP/83-1042

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 NRC INSPECTION REPORT IER-83-18

Dear Mr. O'Reilly:

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

SEVERITY LEVEL 5 VIOLATION (IER-83-18-01-SL5)

Technical Specifications 6.9.2.a. (d) requires that abnormal reactor coolant system pressure boundary degradation be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Regional Administrator of Region II.

Contrary to the above, as of July 5, 1983, the abnormal degradation associated with the "C" reactor coolant pump flow instrument had not been promptly reported.

RESPONSE:

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 Alleged Violation

Initially, the leak at the subject fitting was determined to be a thirty-day Licensee Event Report (LER) based on entering a Limiting Condition for Operation (LCO) of Technical Specification 3.1.5.1 (leak greater than 1 gpm). During subsequent discussions with the NRC Resident Inspector, it was determined thirteen days after the event that the definition of abnormal degradation in Regulatory Guide 1.16 could be applied to the subject instrument fitting as its leak was "through wall" and resulted from improper material (reference: LER-83-15). Carolina Power and Light, therefore, upgraded the event from a 30-day LER to a 14-day LER. This violation is based on Plant personnel misinterpretation of the reporting requirements; therefore, notification within 24 hours of the original event was not made.

3. Corrective Steps Which Have Been Taken and Results Achieved

A prompt report was made to NRC Region II within 24 hours of determining the event should be upgraded from a 30-day LER to a 14-day LER.

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

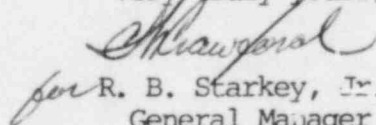
A review of this violation and Regulatory Guide 1.16 was done by those responsible for preparing LERs. This re-emphasis on the use of Regulatory Guide 1.16 should help to prevent a recurrence of this violation.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

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. B. Robinson SEG Plant

CLW/bss

cc: R. C. DeYoung