



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT 11 P1: 32  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550

APR 25 1984

Robinson File No: 13510E

Serial: RSEP/84-308

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

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2  
DOCKET NO. 50-261  
LICENSEE NO. DPR-23  
IE INSPECTION REPORT 84-03

Dear Mr. O'Reilly:

Carolina Power and Light Company has received and reviewed the subject report and provides the following response.

A. Severity Level IV Violation (IER-84-03-SL4)

Technical Specification 4.12.2.a requires that the Spent Fuel Building and Containment Purge filter systems be tested in-place to verify that the HEPA filters and charcoal filters remove acceptable percentages of DOP and halogenated hydrocarbons, respectively.

Contrary to the above, the surveillance testing performed on February 14 - 15, 1984, for the Containment Purge and Spent Fuel Building filter systems was inadequate in that visual inspection of the integrity of the fan and filter system was not required by procedure or adequately performed. During and following the testing, tears were identified in the flexible connections on the suction side of fans HVE-15A and HVE-1A which would invalidate acceptable test results.

RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

When the ventilation system surveillance tests were written, it was not recognized that a formal visual inspection of the ductwork was necessary to validate the test. Emphasis to perform surveillance tests on equipment in the "as found" condition was inappropriately applied to the ventilation system injection and sample point uniformity test. However, in this case, dilution of the downstream sample through the tear could have invalidated the tests, and therefore, a visual inspection was necessary.

3. Corrective Steps Which Have Been Taken

A visual check was added to the filter testing procedures. This check is done prior to performing the flow test. The revised procedures were used in retesting the filter system. Deficiencies identified in the visual inspections were repaired prior to performing the filter tests. The retests performed were acceptable.

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

Visual inspections will be added to the other ventilation test which have not been performed to date.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 30, 1984.

B. Severity Level V Violation (IER-84-03-SL5)

Technical Specification 6.5.1.1.1.a requires that written procedures be maintained which meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures for operation of the emergency diesel generators, including appropriate valve lineups. Operating Procedures (OP) 1606 and 1607, Checkoff Lists for the Emergency Diesel Generators, were established to meet these requirements. Contrary to the above, as of February 16, 1984, OP-1606 and 1607 were not maintained in that valves associated with diesel fuel oil system and cooling water to the turbocharger, which were identified during as-built walkdowns, were not incorporated in these procedures.

RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason For The Violation

CP&L was working on a commitment to the NRC to have safety-related portions of systems walked down by December 31, 1983. These walkdowns were to result in agreement between valve tags, valve checklists, and the flow diagrams. The Diesel Generator Systems were the last systems walked

down. In order to meet the commitment deadline, it was necessary to work on the valve tagging and checklists while the flow diagrams were being revised. During this process, the following valves were inadvertently left off OP-1606 and 1607 which were approved on December 30, 1983.

- a. FO-15 Diesel Oil Storage Tank capped off spare gauge connection.
- b. FO-34A (34B) and 35A (35B) Engine Fuel oil filter delta pressure indicator PI-4502A (PI-4502B) isolation.
- c. FO-38A (38B) Dirty fuel oil tank 'A' ('B') drain.
- d. DG-44A (44B) Engine driven jacket water pump 'A' ('B') discharge to turbocharger.
- e. DA-1A (1B) Air Compressor 'A' ('B') unloader sensing line isolation.

Communication breakdown between those working on different aspects of this project as the deadline approached resulted in these valves being omitted from OP-1606 and 1607. It appears that this communication problem involving a total of eleven valves is isolated to the Diesel Generator Systems. Other minor differences between the completed drawings and valve checklists such as typographical errors have been identified but are not considered programmatic problems. These minor differences are being corrected as they are found.

### 3. Corrective Steps Which Have Been Taken

When the omissions to OP-1606 and 1607 were brought to the Plant staff's attention, they were immediately verified, and an appropriate procedure revision request was submitted for review. The revised OP-1606 and 1607 were effective on April 13, 1984.

The individuals involved in writing the December 30, 1983 version of OP-1606 and 1607 were made aware of this violation and of the necessity to ensure that all the system walkdown data is included in the valve checklists. The communication between those making revisions to flow diagrams and those tagging valves and updating checklists has improved with a re-emphasis on ensuring that changes in flow diagrams are specifically identified to those who change the valve checklists.

### 4. Corrective Steps Which Will Be Taken To Prevent Further Violation

No further corrective action is necessary to prevent further violation. Existing procedures provide adequate guidance. Increased emphasis has been placed on following these procedures.

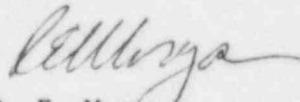
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5. Date When Full Compliance Will Be Achieved

Full compliance was achieved with the revision of OP-1606 and 1607 on  
April 13, 1984.

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

Very truly yours,



R. E. Morgan  
General Manager  
H. B. Robinson SEG Plant

CLW/pam

cc: R. C. DeYoung