



UNITED STATES  
 NUCLEAR REGULATORY COMMISSION  
 REGION II  
 101 MARIETTA STREET, N.W.  
 ATLANTA, GEORGIA 30303

Report No.: 50-261/84-16

Licensee: Carolina Power and Light Company  
 411 Fayetteville Street  
 Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection at H. B. Robinson site near Hartsville, South Carolina

Inspectors:	<u>PK Hardin for</u>	<u>5/29/84</u>
	S. Weise	Date Signed
	<u>PK Hardin for</u>	<u>5/29/84</u>
	R. Prevatte	Date Signed
	<u>PK Hardin for</u>	<u>5/29/84</u>
	A. Hardin	Date Signed
	<u>PK Hardin</u>	<u>5/29/84</u>
	L. Garner	Date Signed
Approved by:	<u>David J. Serr</u>	<u>5/29/84</u>
	for Paul R. Bemis, Section Chief	Date Signed
	Division of Reactor Projects	

SUMMARY

Inspection on April 11 - May 11, 1984

Areas Inspected

This routine announced inspection involved 115 resident inspector-hours on site in the areas of technical specification compliance, plant tour, operations performance, reportable occurrences, housekeeping, site security, surveillance activities, maintenance activities, quality assurance practices, radiation control activities, outstanding items review, IE Bulletin and Notice followup, steam generator repair activities, modification activities, and violation followup.

Results

Of the 15 areas inspected, no violations or deviations were identified.

## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- G. P. Beatty, Jr., Manager, Robinson Nuclear Project Department
- \*R. E. Morgan, General Manager
- \*R. Wallace, Director, Onsite Nuclear Safety
- F. Gilman, Project Specialist, Regulatory Compliance
- \*J. Young, Director, Onsite QA/QC
- R. Chambers, Unit 2 Maintenance Supervisor
- \*C. Wright, Specialist, Regulatory Compliance
- S. Crocker, Manager, Environmental and Radiation Control
- D. Miller, Senior Engineer Construction
- \*D. Baur, Project QA/QC Specialist
- R. Dufresne, Project Engineer

Other licensee employees contacted included technicians, operators, mechanic, security force members and office personnel.

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on May 9, 1984 with those persons indicated in paragraph 1 above. At no time during this inspection was written material provided to the licensee by the inspectors.

### 3. Licensee Action on Previous Inspection Findings

(Closed) Violation 261/84-03-01. The inspector reviewed CP&L response letter dated April 25, 1984 and revised diesel generator valve lineups OP-1606 Revision 4 and OP-1607 Revision 3. The procedure revisions and feedback to those individuals responsible appear to be adequate corrective actions.

(Closed) Violation 261/82-32-03. This item was previously reviewed, as described in inspection report 261/83-09. The inspector reviewed Revision 3 to PLP-024, Technical Specification Surveillance Program. Attachment 6.4 of PLP-024 contains the proper procedure reference to complete the violation corrective action.

(Closed) Violation 261/83-26-01. The inspector reviewed CP&L response letters dated December 1, 1983, January 31, February 29, and April 20, 1984. Discussions were held with cognizant plant management including the Department Manager--Robinson Nuclear Project. CP&L's intent is to use independent verification of eddy current tapes, but not necessarily prior to return to power. These corrective actions appear adequate if increased management attention continues.

(Closed) Violation 261/83-02-04. The inspector reviewed CP&L response letter dated March 25, 1983 and held discussions with the Project Engineer-Operations. The second annunciator review was completed. Several deficiencies were identified, but were minor or on non-safety related equipment. These deficiencies have been incorporated in the annunciator procedure rewrite program. Present modification procedures appear adequate to prevent recurrence.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Plant Tour (71707)

The inspector conducted plant tours periodically during the inspection interval to verify that monitoring equipment was recording as required, equipment was properly tagged, operations personnel were aware of plant conditions, and plant housekeeping efforts were adequate. The inspector determined that appropriate radiation controls were properly established, excess equipment or material was stored properly, and combustible material was disposed of expeditiously. During tours the inspector looked for the existence of unusual fluid leaks, piping vibrations, pipe hanger and seismic restraint abnormal settings, various valve and breaker positions, equipment clearance tags and component status, adequacy of firefighting equipment, and instrument calibration dates. Some tours were conducted on backshifts. No violations or deviations were identified.

6. Technical Specification Compliance (71707/61726)

During this reporting interval, the inspector, verified compliance with selected limiting conditions for operation (LCO's) and reviewed results of selected surveillance tests. These verifications were accomplished by direct observation of monitoring instrumentation, valve positions, switch positions, and review of completed logs and records. The licensee's compliance with selected LCO action statements were reviewed as they happened. No violations or deviations were identified.

7. Plant Operations Review (71707/62703/92706)

- a. The inspectors periodically during the inspection interval reviewed shift logs and operations records, including data sheets, instrument traces, and records of equipment malfunctions. This review included control room logs, maintenance work requests, auxiliary logs, operating orders, standing orders, jumper logs and equipment tagout records. The inspector routinely observed operator alertness and demeanor during plant tours. During abnormal events, operator performance and response actions were observed and evaluated. The inspector conducted random off-hours inspections during the reporting interval to assure that operations and security remained at an acceptable level. Shift turn-overs were observed to verify that they were conducted in accordance

with approved licensee procedures. No violations or deviations were identified.

- b. The inspectors conducted an audit on the Quality Assurance (QA) Nonconformance (NCR) Log to verify tracking of corrective action resolution and to determine if QA NCR records were retrievable from the vault. The inspectors identified one discrepancy. Four NCR's (81/24, 82/50, 82/8, 83/70) have been cancelled by the QA Department without documenting the reason or filing a copy of the NCR with cancellation justification as a QA record. All NCR's which have been reviewed by management and assigned a number should be treated as a QA record regardless of any subsequent status change. Based on discussions with the Project QA/QC Specialist, the inspector determined that the licensee agreed that the documentation was not properly handled when the NCR's were reviewed and cancelled. The licensee provided justification for the cancellation of the NCR's and the inspector determined that an uncorrected safety significant issue did not exist. The issues involved appeared to have been properly resolved. The licensee agreed to document the cancellation/closeout information for these NCR's and place this information in the QA records. Memorandum RQA 84/169 dated May 9, 1984 provided the QA record documenting justification. Training was provided to those staff members responsible for the NCR log to prevent recurrence.

8. Physical Protection (71707)

The inspector verified by observation and interview during the reporting interval that measures taken to assure the physical protection of the facility met current requirements. Areas inspected included the organization of the security force, the establishment and maintenance of gates, doors and isolation zones in the proper condition, that access control and badging was proper, that search practices were appropriate, and that escorting and communications procedures were followed. No violations or deviations were identified.

9. Steam Generator Repair Activities (37701)

The inspectors toured containment and the outside throughout the inspection period. Activities observed included rigging and transportation of the third lower assembly from containment to the tomb, channel head edge preparations, progress of work on placement, preparation, and fitup of each of the new lower assemblies, and observation of modification activities on the three steam domes. The inspectors observed health physics controls, security access controls, and housekeeping in the various work areas. Containment housekeeping appeared to be above average. Personnel in containment appeared to be limited to those actively engaged in work activities. Fire watches and health physics personnel appeared cognizant of their responsibilities and aware of work activities. The inspector also reviewed the survey and posting data on the steam generator tomb and reviewed a draft surveillance procedure for semi-annual monitoring of tomb radiological conditions. No violations or deviations were identified.

## 10. Modifications (37700)

The inspector reviewed the licensee's program for making modifications to the plant. Of specific interest were the modifications which do not require NRC approval in accordance with 10 CFR 50.59. Several modifications were reviewed to ascertain that the modifications were reviewed and approved in accordance with 10 CFR 50.59, the Technical Specifications, plant procedures, and established quality assurance controls. Additional record reviews were made to assure procedure changes, if required, were made, that systems were installed and tested in accordance with procedures, that test results were acceptable, and drawing changes, if required, had been defined and listed.

The following modifications were reviewed:

- Modification-654: This modifications provided for changing the scale on the power range nuclear instrumentation system to accommodate a reduction in power level which had been established in an attempt to extend the life of the steam generator tubes.
- Modification-769: This modification was for the replacement of the HVH Fan and Motor Coolers. Only the fan coolers had been replaced as of the week of April 16, 1984.
- Modification-703: This modification was made to upgrade the valve position monitoring system on the power operated relief valves (PORV's).
- Modification-693: This modification provided for a setpoint revision of rod banks C and D insertion limits.
- Modifications 327 and 337: These modifications installed the equipment necessary to heat and control temperature on the refueling water storage tank. This constitutes one part of the licensee's corrective action for the pressurized thermal shock issue.

No violations or deviations were identified during the review of the modification packages listed.

## 11. Followup on IE Bulletin (IEBs) (92703)

For the following Bulletins, the inspector verified that the response was timely, included the required information, contained adequate commitments and that corrective action as described in the written responses was completed.

- a. IEB 83-04. The licensee received this information IEB and determined that none of the pertinent breakers were installed on safety-related plant systems. This IEB is closed.

- b. IEB 83-08. The inspector reviewed CP&L response letter dated March 30, 1984 and held discussions with cognizant plant personnel. The specific style circuit breakers of concern are not installed in safety-related applications except as reactor trip breakers (which are addressed in IEB 83-01). This IEB is closed.

12. Licensee Event Report (LER) Followup (92700)

The inspector reviewed the following LER's to verify that the report details met license requirements, identified the cause of the event, described appropriate corrective actions, adequately assessed the event, and addressed any generic implications. Corrective action and appropriate licensee review of the events was verified. When licensee identified violations were noted, they were reviewed in accordance with the enforcement policy. The inspector had no further comments.

LER	Event
83-23	Primary to secondary leakage

13. Review of IE Notices (IEN's) (92717)

The inspector verified that IEN's had been received onsite and reviewed by cognizant licensee personnel. Selected applicable IE Notices were discussed with licensee personnel to ascertain the licensee's actions on these items. Licensee action on the following IEN's were reviewed by the inspector and are closed.

IE Notices

83-71  
83-84

14. Outstanding Items Review (92701)

(Closed) Inspector Followup Item 261/82-35-01. Licensee Amendment 79 to DPR-23 corrected this item.

(Closed) Inspector followup item 261/84-02-03. The inspector reviewed CP&L letter NLS-84-144 dated April 13, 1984. This letter revised the inservice inspection and test program to correct the deficiency.

(Closed) Inspector followup item 261/83-12-06. The inspector reviewed procedure QAP-207, Revision 0, Quality Assurance Engineering Document Review. This procedure defines the responsibilities, prerequisites, and review scope for a project quality assurance engineer.

(Closed) Inspector followup item 261/84-09-04. Procedure PMC-011, Revision 0, Welding and Brazing Material Control was issued and reviewed by the inspector. Implementation of the procedure appears adequate for proper material control.

(Open) Inspector followup item 261/84-02-04. The inspector reviewed the Region II NRC letter dated March 29, 1984 and held discussions with the site Training Director concerning CP&L plans to satisfy NRC requirements and concerns. The proposed training program was reviewed in detail. After CP&L management review and incorporation of inspector comments, CP&L will present the program to Region II management.

(Closed) Inspector followup item 261/81-19-05. Modification 758 permanently corrected this deficiency.

(Closed) Inspector followup item 261/82-37-06, Revision 3 to Operating Procedure-006 and Modification-759 corrected these discrepancies.