



Carolina Power & Light Company

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

JUL 19 1984

Robinson File No: 13510E

Serial: RSEP/84-488

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
IE INSPECTION REPORT IER-84-19

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-84-19-04-SL4)

10 CFR 50.73 requires the licensee to submit to the NRC a written report of any event of a type described in the regulation. This report shall include a description of any corrective actions planned or taken.

Contrary to the above, your Licensee Event Report 84-02, dated May 25, 1984, erroneously stated that fire dampers had been properly labeled as a corrective action to prevent recurrence. In fact, as of May 30, 1984, all fire dampers had not been labeled.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

The initial information used in preparing the Licensee Event Report (LER) stated that the fire dampers would be labeled to prevent recurrence of the violation. Prior to submitting the LER, the status of the labeling was checked. There was a verbal miscommunication that the labeling effort was complete when, in fact, it was still in progress. The LER was reviewed by the appropriate personnel; however, the statement that said labeling was completed was not recognized as an error.

3. Corrective Steps Which Have Been Taken and Results Achieved

A Regulatory Compliance instruction for preparing NRC correspondence at H. B. Robinson has been implemented. This requires a Response Input Verification form to be completed for outgoing NRC correspondence. This is in addition to the normal management review process. The person preparing the information for the response and a second person verifying the information to be correct attest to its accuracy on the Response Input Verification Form. This Regulatory Compliance instruction is the process described in Carolina Power and Light Company's June 21, 1984, response to IER-84-10 to ensure a complete review of outgoing correspondence. The appropriate fire dampers were subsequently labeled as stated by the NRC inspector in the inspection report.

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

The above instruction will be utilized for future correspondence to NRC. This additional control substantially reduces verbal miscommunication and improves the accuracy of information transmitted to the NRC which should prevent a recurrence of this violation.

5. Date When Full Compliance Will be Achieved

Full compliance has been achieved.

B. Severity Level IV Violation (IER-84-19-01-SL4)

Technical Specification 6.5.1.1.1.c requires that written procedures be established and implemented for surveillance activities on safety related equipment. Surveillance procedures MST-010, EST-003, and EST-014 were established by the licensee to test automatic actuation circuitry associated with engineered safety features.

Contrary to the above, as of June 8, 1984, adequate surveillance procedures had not been established in that these procedures did not verify complete circuit continuity for initiation of safety injection on high steam line flow coincident with low steam line pressure or low average temperature. Specifically, contact 4-8 of relay SL 1 was not tested.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason for the Violation

When the functional tests were initially written, verification of the output from the system was adequate to demonstrate system operability. Over the years, a functional test has been redefined as including testing of all components in the current path. The functional test of this circuit was not upgraded to this new understanding of functional test.

3. Corrective Steps Which Have Been Taken and Results Achieved

An investigation of this circuit and other similar circuits was conducted to identify any similar occurrence. The results of that investigation was reported in Licensee Event Report LER-84-005.

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

As stated in LER 84-005, the equipment identified that is currently not properly functionally tested will be properly tested prior to declaring the equipment operable.

5. Date When Full Compliance Will be Achieved

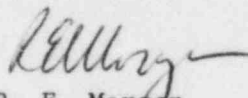
Full compliance will be achieved when the required testing is completed prior to declaring the respective equipment operable.

C. Severity Level V Violation (IER-84-19-02-SL5)

Your cover letter stated "Corrective action to prevent recurrence for Violation C was completed prior to the conclusion of this inspection;" therefore, a reply is not requested.

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

Very truly yours,



R. E. Morgan
General Manager
H. B. Robison S. E. Plant