



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

Report No.: 50-261/84-26

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 Unit 2

Inspection Date: July 11 - August 10, 1984

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

Inspectors: S. Weise 8/10/84
S. Weise Date Signed

Approved by: Paul R. Bemis for 8/15/84
Paul R. Bemis, Section Chief Date Signed
Division of Reactor Projects

SUMMARY

Areas Inspected

This routine, announced inspection involved 48 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, organization and administration, and enforcement action followup.

Results

Of the 15 areas inspected, no violations or deviations were identified in 14 areas; one violation was found in one area (Failure to establish suitable controls, paragraph 5.c.). No apparent deviation was found in any area.

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REPORT DETAILS

1. Persons Contacted

- *R. E. Morgan, General Manager J. Curley,
Manager Technical Support
- *F. Gilman, Project Specialist, Regulatory Compliance
F. Lowery, Unit 2 Operations Supervisor
W. Crawford, Manager, Operations and Maintenance
R. Chambers, Unit 2 Maintenance Supervisor
C. Wright, Specialist, Regulatory Compliance
- *S. Crocker, Senior Specialist, Environmental and Radiation
Control
- *M. Page, Engineering Supervisor - Performance
- *J. Young, Director Onsite QA/QC
- *R. Smith, Manager, Environmental and Radiation Control
- *J. Benjamin, Project Engineer - Operations
- *N. Lawrimore, I&C Foreman

Other licensee employees contacted included construction craftsmen, technicians, operators, mechanics, security force members, and office personnel.

*Attended exit interview of July 24, 1984

2. Exit Interview

The inspection scope and findings were summarized on July 24, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the potential violation. At no time during this inspection was written material provided to the licensee by the inspector.

3. Licensee Action on Previous Inspection Findings (92702)

(Closed) Violation 261/83-26-05. The inspector reviewed CP&L response letter dated December 1, 1983 and new procedure EST-067, Intermediate Range Detector Setpoint Determination. The procedure appears adequate to formally control intermediate range reactor trip and rod stop setpoint determinations.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Plant Tour (71701/62702/71710)

- a. 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 fire fighting equipment, and instrument calibration dates. Some tours were conducted on backshifts. The inspector performed major flowpath valve lineup verifications and system status checks on the following systems:

- (1) Emergency Diesel Generators
- (2) Safety Injection System

b. On July 19 and 21, 1984, the inspector conducted a walkdown of the Safety Injection System outside containment. The inspector reviewed the following controlled documents:

- Operating Procedure (OP) - 1203 Revision 3, Safety Injection System Checkoff List
- Drawing 5379 - 1082 Sheet 1 and Sheet 2 Revision 17

The inspection was conducted to confirm that valve lineups and drawings matched as-built configurations, to identify potential system degradation, to verify that valves were in proper positions and locked if appropriate, and to verify that instrumentation was calibrated, valved-in, and functioning. The following deficiencies were identified:

1. Refueling water storage tank sample valve SI-898I and associated tubing do not appear on Sheet 2 of drawing 5379-1082. Licensee personnel had identified this, and a drawing change was submitted.
2. Valves SI-1208B and -841G valve tags were missing.
3. Valve SI-1208B is not incorporated in OP-1203. This was previously identified by licensee personnel and incorporated in a draft revision.
4. Valve SI-892L is in OP-1203 but not on Sheet 1 of drawing 5379-1082. Licensee personnel indicated that this valve was being redesignated CVC-460 and that procedure changes were in progress. CVC-460 was shown on sheet 3 of drawing 5379-685.

Until the above discrepancies are corrected, this is an inspector followup item (261/84-26-02). No violations or deviations were identified.

- c. During a tour of containment on July 21, 1984, the inspector identified that the two debris screens associated with the Residual Heat Removal (RHR) pumps suction from the containment sump had been removed. With the debris screens removed, the suction line openings were readily accessible. No measures had been taken to cover or otherwise protect the openings from entry of foreign material, which could affect RHR pump or sump isolation valve operability. Investigation indicated that the screens had been removed for about two weeks in conjunction with IE Bulletin 79-14 verification activities. The licensee initiated an investigation and replaced the debris screens. Further investigation indicated that a work request was not utilized to initiate the screen removal. 10 CFR 50 Appendix B requires that activities affecting safety related equipment be suitably controlled to prevent degradation or damage. Failure to establish proper controls during containment sump debris screen removal and RHR suction pipe inspection activities is a violation. (261/84-26-02).

6. Technical Specification (TS) Compliance (71707/62703/61726)

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)

The inspector 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 turnovers were observed to verify that they were conducted in accordance with approved licensee procedures. No violations or deviations were identified.

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. Organization and Administration (36700/92706)

In July 1984, CP&L named a new Manager - Environmental and Radiation Control from outside the company. The inspector held discussions with this individual and reviewed Technical Specification 6.3, ANSI 18.1-1971, Regulatory Guide 1.8 dated September 1975, and the individual's documentation of qualification and experience to verify that his qualification/experience levels conformed to the above regulatory requirements. No violations or deviations were identified.

10. IE Bulletin 84-02, HFA Relays, Followup (92703)

The inspector reviewed IE Bulletin 84-02, CP&L response letter dated July 13, 1984, and plant memorandum 84-807 dated June 29, 1984 to verify that the response was timely and accurate and addressed the bulletin concerns. GE Type HFA relays were not identified as being installed or in stock at Robinson. Therefore, the Bulletin 84-02 concerns are not applicable, and the bulletin is closed.

11. 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 below events were verified. When licensee identified violations were noted, they were reviewed in accordance with the enforcement policy. The inspector had no further comments.

<u>LER</u>	<u>Event</u>
83-01	HVH Unit Circuit Design Deficiency

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

- a. 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 action on these items. Licensee action on the following IEN's were reviewed by the inspector and are closed.

IE Notices

82-10	83-07	84-05 and Rev 1
82-45	83-32 (N/A)	84-07
	83-42	84-09 and Rev 1
	83-53 (N/A)	84-11

83-61	84-13
83-66 and Rev 1	84-16
83-75	84-18
	84-20
	84-21 (N/A)
	84-23
	84-25
	84-26
	84-27
	84-28
	84-35 (N/A)
	84-41 (N/A)
	84-43 (N/A)

- b. IEN 84-03. The inspector reviewed CP&L memo 84-888 dated July 10, 1984 and Training Instruction (TI)-908 Revision 0 and held discussions with plant operations and training personnel. While TI-908 addresses initial and renewal operator license applications, procedures do not exist to ensure (at the company level) that special license conditions are met by the operator and that operators make required disability reports. Failure to comply with these requirements could also result in failure to meet shift manning requirements. Based on the above, licensee actions to resolve the Notice concerns appear inadequate, and the Notice will remain open pending more formal management/procedural controls. The Training Technical Aide did appear to process incoming special license requirements as received.

13. Outstanding Item Review (92701)

(Closed) IFI 261/84-03-06. The inspector reviewed EST-030 Revision 2, Fuel Handling Equipment and Operation Test. This revision added suspended weight switch testing and appears adequate.

(Open) IFI 261/82-27-04. Technical Specification Amendment #78 was issued March 28, 1984, which incorporates mechanical snubber inspection and testing requirements. The inspector reviewed snubber visual inspection surveillance procedure EST-032 Revision 1 and identified no deficiencies or concerns. A functional test surveillance procedure for mechanical snubbers was still under development. This item will remain open until surveillance procedures for functional testing of mechanical snubbers are approved by the licensee and reviewed by the inspector. Functional testing is currently scheduled for August 1984.

(Open) IFI 261/81-31-03. The licensee is replacing HVH unit motor coolers during the current steam generator repair outage. Stainless steel heat exchangers will be installed vice the original copper-based alloy heat exchangers. Two motor coolers had been replaced and accepted at the time of this inspection. The new coolers are expected to significantly reduce cooler degradation. By letter dated August 10, 1983, CP&L committed to resolve the installation problems encountered with the motor cooler discharge lines radiation monitor during the present steam generator repair outage. This item will remain open until resolved.

(Closed) IFI 261/83-02-02. Modification 760 was developed to replace the mechanical air flow sensors with differential pressure sensors. This modification has been installed, however acceptance testing had not been completed at the end of the inspection period. Inasmuch as the routine inspection of annunciators will identify nuisance alarms should the modification be unsuccessful, this item is closed.

(Closed) IFI 261/83-24-03. This issue was reviewed by the resident and regional-based inspectors during the replacement activities. No violations or deviations were identified.

(Closed) IFI 261/83-32-09. The inspector reviewed training records and confirmed that appropriate supervisor training was conducted.

(Closed) IFI 261/83-15-11. The licensee has implemented procedures whereby capacitors are discharged using a resistor to eliminate voltage spikes. Additionally, maintenance on protective relays is performed with the unit off-line.