



Carolina Power & Light Company

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ROBINSON NUCLEAR PROJECT DEPARTMENT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550  
JAN - 9 1985

Robinson File No: 13510E

Serial: RNP/85-20

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  
NRC INSPECTION REPORT IER-84-41

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 V Violation IER-84-41-02-SL5

10CFR50, Appendix B, Criteria V and XI, as implemented by the Licensee's Corporate Quality Assurance Program, requires adherence to procedural measures established for documentation of test results to assure that test requirements have been satisfied.

Contrary to the above, during performance of Operations Surveillance Test Procedure OST-162 on November 7, 1984, data recorded for the duration of the sequence for the emergency diesel generators to start and assume the required loads after initiation of a loss of power, combined with a manual safety injection signal, were rounded off instead of recording the actual value obtained from the stopwatch.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

During the performance of Operations Surveillance Test OST-162, the procedure required that a stopwatch be used to record the duration of the sequence from the time the manual safety injection (SI) signal and loss of power were initiated to the time the emergency diesel generators assumed the required load. The acceptance criteria for this duration was to complete the cycle in less than 50 seconds. The time obtained on the stopwatch was 50.45 seconds. At that time, those individuals involved in the test made a brief review of the data available.

Individuals performing the test made a preliminary decision to round off the value to 50 seconds because the acceptance criteria was in seconds, and the data available appeared to support this. Additionally, the knowledge of the inaccuracies associated with starting and stopping a hand-held stopwatch influenced this decision. It was also known at that time that a thorough evaluation of all the data would be initiated following completion of the test to resolve the timing issue and determine the acceptability of the test. A miscommunication between those involved in the preliminary decision to round off the value and those actually performing the test resulted in the initial recording of the rounded off value without a supporting evaluation.

3. Corrective Steps Which Have Been Taken

During the evaluation following the test, it was decided that rounding off to 50 seconds was inappropriate and that the actual (as found) value obtained should have been documented instead of the rounded off value. Also, it was decided that a correction would be made on the OST to indicate the actual (as found) stopwatch value obtained during the test along with attaching supporting documentation providing justification for surveillance test acceptance.

The same individuals involved in the preliminary decision to round off the stopwatch value were also involved in the test evaluation and final decision to correct the test.

The test (OST-162) has been corrected and accepted as satisfactory with supporting documentation attached indicating that even though the actual (as found) stopwatch value was greater than 50 seconds, post test maintenance testing performed on the timing sequences brought the effective time within the acceptance criteria.

Since rounding off of data is not a normal practice, this occurrence is considered an isolated case, and those individuals involved in this occurrence are cognizant of their inappropriate actions.

4. Corrective Steps Which Will Be Taken

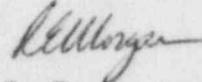
No further action is necessary.

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5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Very truly yours,



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

CLW/wp