



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

Report No.: 50-261/84-41

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 Conducted: November 6-9, 1984

Inspectors:	<u>G. Schnebli</u>	<u>12/7/84</u>
	G. Schnebli	Date Signed
	<u>Frank Jape</u>	<u>12/11/84</u>
	M. Thomas	Date Signed
Approved by:	<u>Frank Jape</u>	<u>12/11/84</u>
	F. Jape, Section Chief	Date Signed
	Engineering Branch	
	Division of Reactor Safety	

SUMMARY

Scope: This routine, unannounced inspection entailed 64 inspector-hours at the site, in the areas of Independent Verification Program, Reactor Coolant System Hydrostatic Test Results Evaluation, Startup Testing and Surveillance Testing.

Results: One violation was identified (Recording rounded-off data in lieu of actual data obtained during surveillance testing - paragraph 8.h).

8502060268 850121
 PDR ADOCK 05000261
 Q PDR

REPORT DETAILS

1. Licensee Employees Contacted

- *J. Benjamin, Principal Engineer - Operations
- R. Chambers, Maintenance Supervisor - Instrumentation and Controls
- E. Lee, Test Coordinator
- *F. Lowery, Manager - Operations
- *R. Morgan, Plant General Manager
- D. Nelson, Operations Supervisor
- *J. Sturdavant, Regulatory Compliance
- *C. Wright, Senior Specialist - Regulatory Compliance

Other licensee employees contacted included four technicians, two operators, and two office personnel.

NRC Resident Inspectors

- *H. Krug, Senior Resident Inspector
- *H. Whitcomb, Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on November 9, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings without significant comment. The following items were discussed:

Inspector Followup Item (IFI) 261/84-41-01, Review retest documentation associated with Blackout/ESF surveillance testing (paragraph 8.g).

Violation 261/84-41-02, Recording rounded-off data in lieu of actual data obtained during surveillance testing (paragraph 8.h).

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Independent Inspection Effort - Unit 2 (92706)

The inspectors reviewed licensee procedure PLP-030, Independent Verification Program, Rev. 0, which establishes the implementation requirements of independent verification and functional testing for H. B. Robinson - Unit 2. The program is applicable to testing, maintenance and operations of Unit 2

equipment, components, and systems. The inspectors discussed the program with licensee personnel who stated that the procedure, which became effective October 26, 1984, is in the process of being implemented. The inspectors reviewed the operations surveillance test (OST) procedures, discussed in paragraph 8 of this report, to verify that the activities in the OST procedures which were independently verified were in accordance with the requirements of procedure PLP-030.

No violations or deviations were identified in the areas inspected.

6. Reactor Coolant System (RCS) Hydrostatic Test Results Evaluation (70562)

The inspectors reviewed the test results from the RCS hydrostatic test (SP-594), which was a required pre-startup test due to the steam generator replacement during the current outage. The procedure also contained thermal expansion testing, which was included with the data reviewed. RCS hydrostatic test procedure review (70362) and test witnessing (70462) were previously accomplished and documented in Report 50-261/84-34. The review consisted of the following:

- a. Verified that all test procedure changes were:
 - approved in accordance with the licensee's administrative controls.
 - annotated to identify the change.
 - verified to not change the basic objective of the test.
- b. Verified that each test deficiency had been resolved, properly documented, and accepted by appropriate personnel.
- c. Verified that all data sheets had been completed and were within acceptance tolerances.
- d. Verified that test pressure and duration met ASME Code requirements.
- e. Verified that RCS temperature was above the nil ductility transition temperature.
- f. Verified that the cognizant engineering function evaluated the test results, and signified that the testing demonstrated that the system met design requirements.

No violations or deviations were identified.

7. Startup Testing - New or Modified Systems (72701)

The inspectors discussed with responsible licensee personnel the testing required due to steam generator replacement that must be completed prior to startup from this outage. The integrated startup testing required was identified in a letter from H. B. Robinson to NRC dated July 26, 1984 (Serial: RSEP/84-500). Approximately 60% of the 44 tests and checks

addressed in the letter has been completed. The remaining testing will be accomplished prior to and during the startup utilizing existing surveillance procedures. The status of this testing will be followed in a future inspection.

No violations or deviations were identified.

8. Surveillance Test Witnessing and Results Review (61701)

The inspectors witnessed selected portions of pre-startup surveillance testing in progress during this inspection, which included:

- OST-162, Emergency Diesel Generator Auto Start on Loss of Power and Safety Injection-Emergency Diesel Trips Defeat.
- OST-163, Safety Injection Test.

During the witnessing of these two tests, which were accomplished in series due to their common prerequisites, the following items were observed:

- a. Satisfactory completion of the procedures would fulfill the requirements of Technical Specifications 3.1.1.3.c.2, 4.5.1.1, 4.5.1.2, 4.6.1.2, 4.6.4, 4.15.2.b, Table 3.5-3 Item 1.a and Table 4.1-1 Item 32.a.
- b. Testing was conducted in accordance with approved procedures and copies were available and in use by personnel conducting the test.
- c. Special test equipment required by the procedures was properly installed and calibrated.
- d. Test procedure prerequisites were complete.
- e. Minimum crew requirements were met.
- f. It appeared to the NRC inspectors present during the testing that test personnel were not adequately briefed prior to performance of the test in that:
 - Personnel stationed at the 20 Point Event Recorder were not certain of the calibration requirements for the recorder or at which point during the test the recorder should be stopped.
 - Data required to be taken during the performance of OST-163 were incomplete in that, the local breaker indication was not logged in Attachment 8.3 as required. This oversight required obtaining the data during the performance of OST-162.

Appropriate licensee management were made aware of the NRC's concerns in this area and in turn informed the inspectors that they had noticed the same problem during the test and that the item would be discussed with test personnel.

- g. During the performance of this testing, the following problems occurred which resulted in unsatisfactory completion of the tests:
- Instrument Air Valve, IA-1716, solenoid failure.
 - Time delay relay malfunction on Safety Injection Pump B, Heating and Ventilation Handling 1, Auxiliary Feedwater Pump A, and Service Water Pump C.
 - Service water valve, SW V6-34A, failed to open.
 - Primary sample valves, PS-956 A thru H, indicator light malfunction.

Licensee personnel stated that work requests had been initiated to correct the above problems and retesting of the affected components would be accomplished after the maintenance was completed.

The inspectors informed licensee personnel that the maintenance and retest documentation associated with the affected components will be reviewed in a subsequent inspection to ensure that all required testing has been satisfactorily completed. This is identified as Inspector Followup Item 50-261/84-41-01, Review retest documentation associated with Blackout/ESF surveillance testing.

- h. One of the objectives of OST-162 is to ensure that the emergency diesel generators will start and assume required load within 50 seconds after initiation by a loss of power to the vital busses combined with a manual safety injection signal. The procedure requires that a stopwatch be used to record the duration of the sequence from indications in the control room. The time obtained from the stopwatch during this portion of the test was 50.45 seconds. Licensee management (who were present during the test) stated that the data obtained from the stopwatch (50.45 seconds) would be rounded-off to the nearest whole number since the acceptance criterion for the test was given as a whole number and the timing inaccuracies associated with starting and stopping the stopwatch. Subsequent review of the as-run procedure showed that the time recorded for the duration of the sequence was the rounded-off data (50.0 seconds) rather than the actual data (50.45 seconds). The inspectors discussed with licensee management the problems associated with recording rounded-off data in lieu of actual data and also requested the licensee's policy on this issue. The licensee stated that it is not normal practice to record rounded-off data and this was considered an isolated case.

The inspectors informed the licensee at the exit meeting that failure to record the actual data obtained from the stop watch during surveillance testing was a violation of 10 CFR 50, Appendix B, Criteria V and XI. This is identified as violation 50-261/84-41-02, Recording rounded-off data in lieu of actual data obtained during surveillance testing.

No other violations or deviations were identified.