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Carolina Power and Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550  
August 15, 1984

Robinson File No.: 13510E

Serial: RSEP/84-523

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-84-23

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 IV Violation (IER-84-23-01-SL4)

Technical Specification 6.5.1.1 requires that written procedures shall be established, implemented, and maintained that meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2.

Contrary to the above, procedures were not adequately implemented in that:

1. Operating Procedures OMM-1009, Operating Notes, Note 63 requires that only one maintenance crew at a time be allowed to work in the Safeguards Racks or associated field instruments. No work may be performed on instruments in the field coincident with activities in the Safeguards Racks, unless the work involves the same channel. Approval of the Maintenance Supervisor or Operations Supervisor is required to deviate from this policy.

Contrary to the above, on June 21, 1984, these requirements were not implemented in that separate maintenance crews were performing calibrations on containment pressure instruments in different channels at locations in the field and in the Safeguards Racks. Appropriate management approval had not been obtained. This resulted in an Engineered Safety Features actuation on the high containment pressure signal.

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2. Administrative Procedure AP-027 Section 2.1.32 requires all Plant employees to initiate maintenance work requests on all observed nonconforming conditions, particularly those on safety-related equipment.

Contrary to the above, as of June 19, 1984, a maintenance work request had not been initiated by the licensed operator who had observed that oil had sprayed onto the surfaces of 'A' emergency diesel generator from the engine during engine startup for the weekly surveillance test conducted June 18, 1984.

3. Health Physics Procedure HPP-006 Revision 2, Radiation Work Permits (RWP), establishes the Plant requirements for development and use of proper radiation work permits for protection of personnel. RWP 2404 established requirements for certain construction activities in the pipe alley of the auxiliary building, including the requirement that all tools and equipment shall be bagged at the step off pad prior to exiting a contaminated area.

Contrary to the above, as of June 24, 1984, workers conducting activities under RWP 2404 were observed placing unbagged tools outside the high contamination area associated with pipe alley.

#### Response

##### A. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

##### B. Reason for the Violation

1. Two instrument crews were simultaneously calibrating the containment pressure channels at different locations. One crew was at the transmitters while the other was at the instrument racks. When the two crews calibrated separate channels, a safety injection signal was generated. The cause of this event was inadequate communication between the two crews working on the same instrument logic. There is an instruction in OMM-1009 which discusses the method by which two crews can work on the instrument logic. This instruction was not followed by the two crews.
2. The operator noticed the oil leak during diesel operation. However, prior to shutting down the diesel the leak appeared to stop. Approximately one-half pint of oil leaked out and this was subsequently cleaned up by janitorial crews. The operator failed to initiate the work request immediately because he believed the leak had stopped.

3. The individual involved was accustomed to working in areas that had a high potential for contamination and, therefore, used double step off pads. With double step off pads the outer shoe covers are removed at the first step off pad, but tools may be carried, unbagged, across the first step off pad. In the event which resulted in the violation, the individual was exiting an area which used only the single step off pad. The individual was working in a high temperature area and was eager to exit. In his haste he confused exiting across the single step off pad with exiting across a double step off pad and mistakenly layed his unbagged tools across the step off pad.

C. Corrective Steps Which Have Been Taken

1. The calibrations of the containment pressure channels were stopped to determine the cause of the safety injection signal. Calibration of one channel by one work crew was allowed after the cause of the event had been determined.
2. A work request initiated on June 22, 1984, was completed on June 27, 1984.
3. The personnel involved in passing unbagged tools across the step off pad were restricted access to the Radiation Control Area. Although only one individual actually violated the procedure, the entire crew went through Radiation Control Area Mock-up Dressout Training on July 13, 1984. In addition, these individuals were given additional radiation control retraining by the ALARA group. This retraining should prevent recurrence of this violation.

D. Corrective Steps Which Will Be Taken

1. The instruction, which discusses the method by which two crews can work on instrument logic, is being routed to the appropriate personnel for review.
2. No further corrective action is deemed necessary.
3. No further corrective action is deemed necessary.

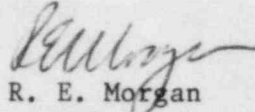
E. Date When Full Compliance Will Be Achieved

1. Full compliance will be achieved by August 31, 1984 when the appropriate personnel have reviewed OMM 1009 Note 63.
2. Full compliance has been achieved.
3. Full compliance has been achieved.

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

Very truly yours,



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

REM/sr