



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

Report No.: 50-261/84-37

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: October 11 - November 10, 1984

| | | |
|--------------|---|----------------|
| Inspectors: | <u>PK Hardin for</u> | <u>12/4/84</u> |
| | H. E. P. Krug, Senior Resident Inspector | Date Signed |
| | <u>PK Hardin for</u> | <u>12/4/84</u> |
| | H. C. Whitcomb, III, Resident Inspector | Date Signed |
| Approved by: | <u>P. E. Fredrickson</u> | <u>12/6/84</u> |
| | P. E. Fredrickson, Section Chief (Acting) | Date Signed |
| | Division of Reactor Projects | |

SUMMARY

Scope: This routine, announced inspection involved 169 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 IE Notice followup, organization and administration, independent inspection and enforcement action followup.

Results: Of the 16 areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Licensee Employees Contacted

R. Barnett, Principal Specialist, Maintenance
G. Beatty, Manager, Robinson Nuclear Projects Department
J. Benjamin, Principal Engineer, Operations
R. Chambers, Maintenance Supervisor - I&C and Electrical
C. Crawford, Manager, Maintenance
J. Curley, Manager, Technical Support
J. Jeffries, Manager, Corporate Nuclear Safety
W. Gainey, Mechanical Maintenance Supervisor
F. Lowery, Manager, Unit 2 Operations
R. Morgan, Plant General Manager
B. Rieck, Manager of Control and Administration
D. Stadler, Director of Regulatory Compliance
L. Williams, Security Supervisor

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

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. No written material was provided to the licensee by the resident inspector during this report period.

3. Licensee Action on Previous Enforcement Matters

(Open) Violation 261/84-26-02; Inadequate controls over removal of containment sump debris screens. The inspector is reviewing how control over work covered by modification packages is integrated with work which is controlled by work requests.

4. Plant Tour (71707, 62703, 71710)

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 valve lineup verifications and system status checks on the following systems:

- a. Emergency Diesel Generators
 - b. Safety Injection System
 - c. Shutdown Service Water System
5. Technical Specification 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. No violations or deviations were identified.

The inspectors conducted a review of the licensee Technical Specification Surveillance Program to evaluate the licensee's ability to determine equipment operability. Criteria used in assessing the adequacy of the established surveillance program included the following:

- Determine the Technical Specification (TS) definition for operability.
- Determine the licensee's program for determining operability for systems required to be operable by TS.
- Review, on a sampling basis the TS Limiting Condition for Operation requirements.
- Review surveillance requirements for systems reviewed and determine if they provide reasonable assurance that the system is operable.
- Review the licensee's program which supplements the listed surveillance requirements to assure operability.
- Determine if TS surveillance requirements for systems and the supplemental program together provide reasonable assurance that the equipment is operable.

The following documents were reviewed during the inspection effort:

Technical Specifications Sections 3 and 4, Revision 79, dated October 30, 1984

PLP-024, Technical Specification Surveillance Program, Revision 5

PLP-025, In-Service Inspection Program, Revision 0

OST-101, Chemical and Volume Control System Component Test (monthly),
Revision 2

OST-102, Chemical and Volume Control System Component Test (Quarterly),
Revision 1

OST-107, Basic Acid Blender Control Valve and Pump Operation (Monthly)
Revision 2

OST-403, Diesel Fuel Oil Transfer

Pumps Test (Monthly) Revision 2

OST-908, Component Cooling Water System Component Test (Monthly),
Revision 3

In addition to a review of the documents listed above, the inspectors conducted interviews with licensee personnel assigned responsibilities in the TS Surveillance Program, including: the TS Surveillance Program coordinator (Regulatory Compliance); the Operations Technician responsible for operations surveillance scheduling; and QA personnel responsible for the performance of audits and surveillances of the Surveillance Program.

The inspectors determined that the licensee definition of operability as described in the H. B. Robinson TS (non-standard) conforms with the definition outlined in the Westinghouse Standard Technical Specification (STS). The inspectors reviewed section 4 of the licensee TS, which prescribes the required TS Surveillances to provide equipment operability. A random sample of four components was selected and reviewed in detail to ensure that adequate coverage is addressed. The components evaluated included the charging pumps, the service water pumps, the boric acid system and the instrument service air system. Coverage of TS surveillance requirements is described in licensee implementing procedure PLP-024 (Technical Specification Surveillance Program). This procedure contains all TS surveillance testing required by sections 3 and 4 of the licensee TS. It was determined that the TS surveillance program is controlled and maintained by the TS Surveillance Coordinator of the Regulatory Compliance Group. All TS Surveillance requirements are scheduled on a monthly schedule and the coordinator updates this schedule to reflect the completion of surveillance testing on a weekly basis. In addition to the scheduling of TS surveillance requirements, the operations department also schedules testing to be performed on equipment not required by the TS. This supplemental program appears to be comprehensive and the inspector determined that the combinations of the PLP-024 Program and the Supplemental administrative program provide a reasonable assurance that the equipment is operable. The adequacy of individual component tests to determine operability was not evaluated, however, it appears that the licensee has addressed the equipment operability status for equipment not specifically required to be tested by TS.

During the review of PLP-024, the inspector found several administrative deficiencies with respect to the TS. Since many recent TS changes have occurred, site procedures, such as PLP-024, have not been revised to reflect these TS changes in a timely manner. This concern was brought to the attention of licensee representatives and the inspector was informed that a non-conformance report was being generated addressing this problem as a result of a recent QA audit. The inspector conducted interviews with QA personnel, including the lead auditor responsible for this finding, and determined that the QA audit in this area was thorough and the non-conformance report (NCR #84-470) was an effective method of ensuring a proper and timely solution to the problem.

Within the area, no deviations or violations were identified.

During the morning of November 8, 1984, licensee personnel overpressurized the condensate storage tank resulting in some distortion and creasing of the tank walls and dome. The licensee has formed an evaluation team to determine cause and appropriate corrective action. This is an inspector followup item 50-261/84-37-01, "Overpressurization of the Condensate Storage Tank."

6. Plant Operations Review (71707, 62703)

Periodically during the inspection interval, the inspector 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. The inspector conducted random off-hours inspections during the reporting interval to assure that operations and security remained at an acceptable level.

On the morning of November 8, 1984, an inadvertent SI trip ("A" Train only) was initiated as a result of restoring electrical power to the Train A Reactor Protection and Safeguard circuits from the Train "A" 125V Battery. Power to these circuits had been isolated to perform the "MCC A Bus Isolation" Modification Package dated November 1, 1984. This modification will reduce the load on Train "A" 125 VDC Battery, by the removal of non-essential secondary plant loads, to enable the Train "A" Battery to meet the service test as required by Regulatory Guide 1.129. This load reduction will be made by isolating the air side seal oil backup pump and the Emergency Bearing Oil Pump by removing the middle section of the bus bars in Section 3 of MCC A. It is intended that these loads will be refed at a later time (approximately 2 weeks) from a new battery "C" under a different modification package.

A manual SI blocking signal existed prior to the Train "A" Battery isolation. It appears that the following sequence of events occurred during the performance of the modification. This sequence of events was obtained

by the resident inspectors from senior licensee management representatives including the Manager of Operations and the Operations Supervisor.

As directed by the modification package procedure, the Train "A" Battery was electrically isolated from the Train "A" Reactor Protection and Safeguards circuits. The manual SI block was removed as well as electrical power to the bistables and relays in the reactor protection and safeguards circuits. It appears that the affected "AND" gates were reset to respond to the low pressurizer pressure SI signal when power to the circuits was restored. When the modification package was completed and the "A" Battery unisolated. An "A" train SI signal was initiated since the manual blocking signal was no longer present. In anticipation of such problems, the licensee procedure required that this modification be performed during the outage.

Within the areas inspected, no violations or deviations were identified.

7. 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.

8. Organization and Administration (36700/92706)

On October 3, 1984, the licensee notified the Senior Resident Inspector that the onsite position of Director of Regulatory Compliance had been filled by an experienced engineer currently employed in a licensing function in Raleigh, NC. On October 29, 1984, the inspector met with the new Director and discussed compliance activities.

On November 9, 1984, the inspectors met with the manager of Corporate Nuclear Safety. The discussions covered the various interfaces between the Nuclear Safety Groups and other corporate and plant organizations including Operations, Regulatory Compliance, and Quality Assurance. The plant inspection function of the onsite Nuclear Safety Unit (ONSU) was discussed.

Within the areas inspected, no violations or deviations were identified.

9. IE Bulletin Followup

IE Bulletin 84-03, "Refueling Cavity Water Seal" dated August 24, 1984.

In mid-September Region II notified the licensee of priority NRC interest in the licensee's evaluation, since the fuel load date for Cycle 10 was then only a few days away. Results of tests of pneumatic seal "push-through" pressure and other related information in response to the Bulletin was submitted

pressure and other related information in response to the Bulletin was submitted by the licensee in a summary report dated October 12, 1984.

Within the areas inspected, no violations or deviations were identified.

10. Steam Generator Blowdown Modification (37700)

The following documents were reviewed during the inspection.

a. Engineering Documents

- (1) CWP 747 Steam Generator Blowdown and Wet Layup System.
- (2) CWP 747 A and awp 747B Mechanical Package for non "O" systems.
- (3) CWP 747 C - Civil Work for Foundation and Drainage.
- (4) CWP 767 D - Civil Work for Ladders and Platforms.
- (5) CWP 747 F - Installation of Instrumentation.

Review of the above documents revealed that they are in conformance with Technical Specifications (TS) for modifications as described in Section 6.5.1.1.2 of the TS. It was noted that the documents satisfy the requirements for a first party safety review as defined in TS 6.5.1.2.1 and the second safety review defined in TS 6.5.1.2.2. It was also noted that the review was performed by a group of engineering personnel. The documents identify specific operations, maintenance and routine testing procedure changes that must be completed, and as-built drawing changes that are required.

b. Plant Nuclear Safety Committee Meeting Minutes

Minutes of the 112th committee meeting of March 29, 1984, were reviewed and revealed that CAP 747, Steam Generator Blowdown and Wet Layup System modification did not constitute changes to the facility technical specifications or involve any unreviewed safety question.

- c. A facility tour was made to provide a cursory review of those steam generator blowdown components which are located external to primary containment (major portion of modification). Based on this tour it was concluded that the as-built modification was in conformance with information described in item 3.a above.

Within the areas inspected, no violations or deviations were identified.