



Carolina Power & Light Company

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ROBINSON NUCLEAR PROJECT DEPARTMENT

POST OFFICE BOX 790

HARTSVILLE, SOUTH CAROLINA 29550

MAR 28 1985

Robinson File No: 13510E

Serial: RNP/85-644

Dr. J. Nelson Grace, Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W., Suite 3100
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REGION II INSPECTION REPORT 85-12

Dear Dr. Grace:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

Severity Level V, Violation RII-85-12-01-SL5

10CFR50, Appendix B, Criterion V, requires activities affecting quality be prescribed by documented procedures. ASME Boiler and Pressure Vessel (B&PV) Code, 1978 edition, with Addenda through the Summer of 1978, has been identified as the applicable code for inservice testing of pumps and valves. ASME B&PV Code, Section XI, Paragraph IWP 3500(a), Duration of Test, requires each pump to be run five minutes under conditions as stable as the system permits prior to making the required observations or measurements. Carolina Power and Light Company (CP&L) Procedure OST-108, Revision 4, "Boric Acid Pumps Inservice Inspection (Monthly)," has been identified as the applicable procedure for inservice testing of the "A" and "B" Boric Acid Pumps.

Contrary to the above, activities affecting quality were not adequately prescribed by documented procedures in that CP&L Procedure OST-108, Revision 4, "Boric Acid Pumps Inservice Inspection (Monthly)," does not require that the pump and system be allowed to stabilize for five minutes prior to taking required data.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

The Inservice Inspection (ISI) requirement of ASME Section XI IWP-3500(a), to run the Boric Acid Pumps for a minimum of five (5) minutes, prior to taking data, was not included in the Operations Surveillance Test OST-108 due to an oversight. A review of the other ISI pump test procedures verified that the omission of the minimum run time requirement in OST-108 was an isolated case. A statement similar to; "After the pump has run for five (5) minutes, record the required data," was included in the other ISI pump tests.

3. Corrective Steps Which Have Been Taken

Effective March 19, 1985, OST-108 has been revised to include the requirement to run the Boric Acid Pumps for five minutes prior to taking the required data.

4. Corrective Steps Which Will be Taken

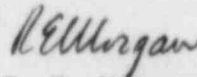
No further corrective action is required.

5. Date When Full Compliance Will be Achieved

Full compliance has been achieved with the above revision to OST-108.

If you have any questions regarding this response, please contact Mr. David C. Stadler at (803) 383-4524, Extension 363.

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson S. E. Plant

CLW/tk:C-506

cc: H. E. P. Krug
Document Control Desk