



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION II  
101 MARIETTA ST., N.W., SUITE 3100  
ATLANTA, GEORGIA 30303

FEB 19 1981

SSINS 6025

*Handwritten notes:*  
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James P. O'Reilly  
Checked  
1/22/81

MEMORANDUM FOR: Dudley Thompson, Director, Enforcement and Investigation  
Staff, Office of Inspection and Enforcement

FROM: James P. O'Reilly, Director, Region II

SUBJECT: SELECTION OF SEVERITY LEVEL

The violation discussed in the enclosure to this memorandum has been classified by Region II as Severity Level IV. Based on a literal reading of the detailed guidance provided in the supplements to the proposed enforcement policy, a different severity level could be assigned if one failed to properly consider relative significance. Background information and our basis for selecting the severity level are described in the enclosure.

We plan to issue this citation by February 20, 1981. If you have any questions or concerns, please contact C. M. Upright, telephone 242-5623.

We recommend that this example be included in future guidance on the enforcement policy.

*Handwritten signature:* James P. O'Reilly  
James P. O'Reilly

Enclosure: Selection of Severity  
Level

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FEB 25 1991

Multiple Addressees

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ENCLOSURE

SELECTION OF SEVERITY LEVEL

Denergized Heat Trace Circuits - H. B. Robinson 2

At 9:35 a.m. on January 14, the licensee issued a clearance to work on boric acid transfer pump "A" heat trace circuits. The instructions for work on Boric Acid Transfer Pump "A" are contained in Robinson's Operations Work Procedure CVC-6 in Revision 5 of Standing Order No. 9. The clearance was placed in accordance with the procedure as interpreted by the operator. About two hours later an I and C technician performing a daily periodic test on heat tracing noted heat trace circuits for both the "A" and "B" Boric Acid Transfer Pump were denergized. The I and C technician reported the conditions to the shift foreman. The shift foreman started reactor shutdown in accordance with 10 CFR 50.36(c)(2), since Technical Specification 3.2.3.e, which requires at least one operable channel of heat tracing on the flow path from the boric acid tanks, could not be met.

Reactor power had been reduced 25 mwe when heat tracing was restored to the "B" pump. The temperature in the line did not go below 175 degrees F compared to a limit of 145 degrees F and flow through the line was demonstrated in that the reactor was being shutdown by deborating with the "B" pump.

The loss of heat tracing was caused by an inadequate clearance procedure which was interpreted to authorize opening the breaker on E1 primary and E1 secondary. These breakers also denergize E2 primary and E2 secondary and Circuit 5 primary and secondary which are the heat trace circuits for the "B" pump and the filter respectively. The licensee stated the intent of the procedure was that the fuses would be pulled for the affected heat trace circuits rather than open the breakers.

This violation has been classified as a Severity Level IV vice a Level III based on the following mitigating circumstances.

1. The LCO which was violated is intended to maintain the boric acid in solution. The boric acid remained in solution due to continue recirculation of the solution with the "A" pump while the heat tracing was being repaired.
2. A low temperature alarm for the heat trace was in service.
3. Prompt action was taken to return the heat trace circuits to service.
4. Prompt action was taken by the licensee to meet regulatory requirements. That is, reactor shutdown was initiated.