UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

July 21, 2008

Carolina Power and Light Company
ATTN: Mr. Tom Walt, Vice President
H.B. Robinson Steam Electric Plant
Unit 2
3851 West Entrance Road
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT – NRC PROBLEM IDENTIFICATION AND RESOLUTION (PI&R) INSPECTION REPORT 05000261/2008006

Dear Mr. Walt:

On June 19, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed a team inspection at your H.B. Robinson Steam Electric Plant Unit 2. The enclosed inspection report documents the inspection results, which were discussed with you and other members of your staff on June 19, 2008.

This inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and with the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of activities, and interviews with personnel.

On the basis of the sample selected for review, there were no findings of significance identified during this inspection. The team concluded that problems were being identified, documented, evaluated, and resolved within the PI&R programs. However, the team identified evidence of a weakness in your corrective action program (CAP), in that, several conditions adverse to quality had not been entered into the CAP as nuclear condition reports (NCRs). Additionally, the team identified a two-year trend within the Self-Evaluation Program, in that four self-assessments had documented issues where conditions adverse to quality had not been consistently entered into the CAP.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document

Enclosure

Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Steven J. Vias, Chief
Reactor Projects Branch 7
Division of Reactor Projects

Docket No.: 50-261
License No.: DPR-23

Enclosure: Inspection Report 05000261/2008006
w/Attachment: Supplemental Information

cc w/encl:

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cc w/encl:

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Letter to Thomas D. Walt from Steven J. Vias dated July 21, 2008

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT – NRC PROBLEM IDENTIFICATION AND RESOLUTION (PI&R) INSPECTION REPORT 05000261/2008006

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No:	50-261
License No:	DPR-23
Report No:	05000261/2008006
Licensee:	Progress Energy (CP&L)
Facility:	H. B. Robinson Steam Electric Plant, Unit 2
Location:	Hartsville, SC
Dates:	June 2 – 6, 2008 (Week 1) June 16 – 19, 2008 (Week 2)
Inspectors:	J. Reyes, Resident Inspector, Crystal River U3, Team Leader J. Hamman, Project Inspector S. Atwater, Senior Project Inspector D. Arnett, Project Inspector E. Morris, Resident Inspector, Robinson U2
Approved by:	S. J. Vias, Chief Reactor Projects Branch 7 Division of Reactor Projects

Enclosure

SUMMARY OF ISSUES

IR 05000261/2008006, 06/02/2008 - 06/19/2008; Robinson Steam Electric Plant, Biennial Baseline Inspection of the Problem Identification and Resolution.

The inspection was conducted by one Region II Resident Inspector (Team Lead), one Region II Senior Project Inspector, two Region II Project Inspectors, and the Robinson Resident Inspector. No findings of significance were identified during this inspection.

Identification and Resolution of Problems

The team determined that the licensee was identifying plant deficiencies at an appropriately low level. However, the team identified a weakness where the licensee had not consistently entered conditions adverse to quality into the CAP process. The team identified several examples where conditions adverse to quality had not been either identified or entered into the CAP. Additionally, the team identified a trend where several self-assessment reports had identified instances where conditions adverse to quality had not been entered into the CAP. The team determined that for those issues that had been entered into the CAP, the licensee was properly prioritizing and evaluating those issues, and when appropriate performing corrective actions to prevent recurrence. The team concluded that, generally, the licensee was providing an effective CAP.

On the basis of interviews and document reviews conducted during this inspection, the inspectors determined that workers at the site felt free to enter safety concerns into the corrective action program. The inspectors concluded that the Employee Concerns Program was functioning acceptably.

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution

a. Assessment of the Corrective Action Program

(1) Inspection Scope

The inspectors reviewed items selected across the seven NRC cornerstones of safety to determine if problems were being properly identified, characterized, and entered into the corrective action program (CAP) for timely and complete evaluation and resolution. The inspectors reviewed the licensee's CAP procedure, CAP-NGGC-0200, "Corrective Action Program," which described the process for documenting and resolving issues via NCRs. When necessary, the inspectors reviewed NCRs older than October 2006 that were referenced by the original NCR sample set. The team examined NCRs and work orders (WOs) associated with the following risk significant systems: component cooling water; service water; chemical volume and control; auxiliary feed water (AFW); emergency safety features/ reactor protection; and the emergency diesel generators. The team reviewed NCRs associated with issues in the Operations, Maintenance, Engineering, Radiological Protection, Chemistry, Emergency Preparedness, and Security departments. The team reviewed operating experience documents, and the Employee Concerns Program. The team also reviewed licensee corrective action trend reports, NCR effectiveness reviews, and Quality Assurance (QA) department audits and assessments from the review period. The team evaluated these items to determine the licensee's threshold for identifying problems.

The inspectors conducted walkdowns of the above mentioned risk significant systems to verify that problems had been properly identified and characterized in the CAP. System performance was reviewed by discussion with system engineers and by review of work requests (WRs), completed maintenance work orders, maintenance rule data, and system health reports to verify that equipment deficiencies were being appropriately entered into the CAP. Control room operator logs and equipment deficiency logs were reviewed to verify that NCRs were initiated for deficiencies described in the logs when appropriate. In addition, the inspectors attended plant morning status meetings and CAP initial review meetings to observe management oversight in the corrective action process. The inspectors reviewed licensee audits and self-assessments, focusing primarily on problem identification and resolution to verify that findings were entered into the CAP and to verify that these findings were consistent with the NRC's assessment of the licensee's CAP.

Documents reviewed are listed in the Attachment.

(2) Assessment

Identification of Issues.

The team determined that the licensee was identifying plant deficiencies at an appropriately low level. However, the team identified a weakness where the licensee had not consistently entered conditions adverse to quality into the CAP process. The team identified several examples where conditions adverse to quality had not been either identified or entered into the CAP. The licensee wrote condition reports for the issues identified by the team and at the time of the closure of the inspection, the licensee was evaluating the proper corrective actions, if any. No operability issues were identified as a result of writing any of the NCRs, and no examples were found where personnel utilized a problem reporting system outside the CAP. The following are examples of issues identified by the inspectors.

- During a monthly surveillance on the B emergency diesel generator, a small jacket water leak had been identified by operators. The leak had stopped once the engine heated up. Although a WO had been written to perform further inspections and plan for repairs, this adverse condition had not been entered into the CAP, either for evaluating the leak or trending the leak rate. (NCR 283992)
- Pulsing noise/vibrations had been observed in the drain lines between the steam driven AFW pump and the miscellaneous drain collection tank. A system engineer had initiated an evaluation of this issue, however, no NCR had been written to document his evaluation. After further review, the licensee found that another system engineer had previously evaluated a similar issue on the AFW system. (NCR 282092)
- While performing a control room board walk down, the inspectors observed a flow indicator on the motor driven auxiliary feed water system was reading 40 gallons per minute when there was no flow. Although a work order had been written to schedule repairs, the adverse condition had not been entered into the CAP for evaluation. (NCR 283547)
- During a system walk down, the inspectors observed that a vital card reader was working intermittently. Security officers had to mechanically agitate the card reader to make it operate. (NCR 282029)
- While performing a system walk down with the system engineer in the Hagan room where the reactor protection system was located, a test cart was observed by the inspectors to be secured to a conduit. Additionally, two other equipment boxes were unsecured. The licensee could not locate the seismic evaluation of the equipment. Engineering judgment was used to assist in making an immediate operability determination and no issues were identified. Engineering planned to re-do the seismic calculations. (NCR 282119)
- The inspectors reviewed the control room equipment deficiency log (blue dots) and found that several deficiencies had been identified as conditions adverse to quality by the licensee. Although WOs had been written to schedule repairs, NCRs had not been written to evaluate the condition of the issues. (NCR 284006)
- The A residual heat removal cooler had developed a small leak and was eventually replaced with a new cooler. However, no NCR had been written to address the adverse condition or to trend the leak. The licensee determined that no operability issues existed during the period the cooler had been leaking. (NCR 284002)

Prioritization and Evaluation of Issues

The team determined that NCR level classifications were consistent with established procedures and that licensee audits and self-assessments generally confirmed that conclusion. The team further determined that operability, reportability, degraded or non-conforming condition determinations and cause evaluations were also consistent with the station CAP procedure. Each NCR written and priority level assigned was reviewed during the plan of the day meeting which was chaired by the superintendent shift operations and attended by upper management and department heads. Management reviews of NCRs were thorough and adequate consideration was given to system or component operability and associated plant risks.

Effectiveness of Corrective Actions

Based on a review of numerous corrective action plans and their implementation, the team found that the licensee's corrective actions were effective. Effectiveness reviews and audits adequately identified issues. The team noted that the licensee had recently established a Corrective Actions Review Board (CARB) where quality reviews, oversight, and preliminary grading of significant and selected adverse condition NCR investigations were conducted. The team observed a meeting of the CARB and determined the CARB was providing valuable feedback and comments to the root cause investigation team.

(3) Findings

No findings of significance were identified

b. Assessment of the Use of Operating Experience

(1) Inspection Scope

The inspectors examined licensee programs for reviewing industry operating experience, reviewed the licensee's operating experience database, and interviewed personnel, to assess the effectiveness of how external and internal operating experience data was handled at the plant. In addition, the inspectors reviewed NCRs that contained investigations relating to notification documents (NRC generic communications, 10 CFR Part 21 reports, licensee event reports, vendor notifications, and the Progress Energy internal operating experience items, etc.), which had been issued since October 1, 2006, to verify whether the licensee had appropriately evaluated each notification for applicability to the Robinson Nuclear plant.

Documents reviewed are listed in the Attachment.

(2) Assessment

The team determined that the licensee was effective in screening operating experience for applicability to the plant. The inspectors verified that the licensee had entered those items determined to be applicable into the CAP and taken adequate corrective actions to address the issues. External and Internal operating experience was adequately utilized and considered as part of formal root cause evaluations for supporting the development of lessons learned and corrective actions for CAP issues.

(3) Findings

No findings of significance were identified

c. Assessment of Self-Assessments and Audits

(1) Inspection Scope

The inspectors reviewed CAP trend reports, CAP backlogs, NCR trend reports, department self-assessments, and audits to verify that the licensee appropriately prioritized and evaluated problems with the CAP in accordance with their risk significance. The inspectors compared the NRC's CAP assessment results against the licensee's assessment of the CAP effectiveness.

Documents reviewed are listed in the Attachment.

(2) Assessment

The team determined that the scope of self-assessments and audits was adequate. Department self-assessments and QA audits were generally thorough, self-critical and effective in identifying issues that were entered in the CAP for resolution. The team noted that assessment team members also included personnel from other Progress Energy sites and/or members from outside the Progress Energy Fleet. Corrective actions developed as a result of these assessments and audits were generally effective.

The inspectors also reviewed the QA assessments of the CAP program performance. The management organization appropriately responded to QA by initiating NCRs, performing investigations, and taking corrective actions relating to the assessment results. However, the team found that the licensee had not identified that a two-year trend existed within the self-assessment reports of the Self Evaluation program. In these reports a recurring theme was identified where the licensee had determined that adverse conditions were not consistently being entered into the CAP. The licensee initiated NCR 284047 to address the trend, and to document their failure to identify this trend. The assessments and issues relating to the recurring theme are as listed below.

- A deficiency identified examples of conditions adverse to quality found in the plant observation database and the control room log without an accompanying NCR. (Formal Self-Assessment Report 256902)

- A weakness was identified in which NCRs were not written for low significance conditions adverse to quality. (Performance Evaluation Support Assessment 07-11-SW-R)

- Deficiencies identified examples of potential conditions adverse to quality documented in the control room log and in the plant observation database without initiating an accompanying NCR or initiating an NCR in a timely manner. (Formal Self-Assessment Report 213601)

- An issue was identified where the threshold toward NCR initiation was too high to ensure that conditions adverse to quality were consistently captured for continuous improvement. (Nuclear Assessment Section Report R-SE-06-01)

(3) Findings

No findings of significance were identified

d. Assessment of Safety-Conscious Work Environment

(1) Inspection Scope

The team reviewed audits, assessments, NCRs, WOs, and other corrective action documents and held discussions with personnel at various levels in the organization to assess if a work environment existed that was conducive to the identification of nuclear safety issues. Inspectors also examined the licensee's Employee Concerns Program records and discussed the program with the program coordinator to determine if issues affecting nuclear safety were being appropriately addressed.

(2) Assessment

The team determined that workers at the site felt free to raise safety concerns. Personnel stated that they do not hesitate to raise nuclear safety issues to their management, nor do they fear retaliation by their management for doing so. Through interviews with security management the inspectors became aware that a kiosk had been installed which allowed site personnel the ability the initiate an anonymous NCR. The inspectors viewed this as a positive addition to the site as it provides employees another method to raise safety concerns to the plant management. However, the inspectors determined that although the kiosk was available to anyone who wanted to initiate an anonymous NCR, the security department had not made the installation of this kiosk site-wide knowledge. The inspectors questioned the licensee about the kiosk availability to all personnel and the licensee wrote NCR 282320 to determine whether additional kiosks should be made available, and how to inform site employees on the kiosk location and use. The inspectors did not identify any reluctance on the part of the licensee staff to report safety concerns. The team had no indication during this inspection of individuals being inhibited from identifying problems using the corrective action process. Inspectors concluded that the Employee Concerns Program was functioning acceptably and that there were no technical safety issues identified that were lingering without attention in the program.

(3) Findings

No findings of significance were identified.

4OA6 Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. Tom Walt and other members of the licensee staff on June 19, 2008. The licensee acknowledged the results. The inspectors confirmed that inspection activities discussed in this report did not contain proprietary material.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee personnel:

J. Adams, Superintendent, Nuclear Assessment Section
N. Bach, Superintendent, Environmental and Chemistry
C. Baucom, Manager, Support Services Nuclear
T. Bonnette, Senior Specialist, Emergency Preparedness
S. Brown, Manager, Outage and Scheduling
C. Castell, Supervisor, Licensing
D. Douglas, Superintendent, Mechanical Maintenance
P. Fagan, Superintendent, Mechanical/Civil/Design
S. Farmer, Manager, Engineering
S. George, Supervisor, Self Evaluation Unit
K. Jordan, Senior Specialist, Emergency Preparedness
E. Kapopoulos, Plant General Manager
J. Long, Assessor, Plant Evaluation Support
J. Lucas, Manager, Nuclear Assessment
D. Martrano, Supervisor, Engineering Programs
T. Pilo, Corporate, Emergency Preparedness
S. Price, Senior Specialist, Employee Concerns
G. Sanders, Senior Licensing Engineer
T. Tovar, Manager, Operations
T. Walt, Vice President, Robinson Nuclear Plant

NRC personnel:

R. Hagar, H.B. Robinson Senior Resident Inspector
S. Vias, Branch Chief, DRP Branch 7

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None.

Closed

None.

Discussed

None.

LIST OF DOCUMENTS REVIEWED

Procedures

ADM-NGGC-0101 Maintenance Rule Program, Rev 20
ADM-NGGC-0104, Work Management Process, Rev. 30
ADM-NGGC-0107, Equipment Reliability Process Guideline, Rev. 8
AP-049, RNP Self Evaluation Programs Supplement, Rev 1
CAP-NGGC-0200, Corrective Action Program, Rev. 22
CAP-NGGC-0201, Self-Assessment and Benchmarking programs, Rev. 11
CAP-NGGC-0202, Operating Experience Program, Rev. 12
CAP-NGGC-0204, Human Performance Program, Rev. 1
CAP-NGGC-0205, Significant Adverse Condition Investigations, Rev
CAP-NGGC-0205, Significant Adverse Condition Investigations, Rev. 6
CAP-NGGC-0206, Corrective Action Program Trending and Analysis, Rev. 2
EGR-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews
MNT-NGGC-0001, Maintenance Rework Program Rev 2
OPS-NGGC-1305, Operability Determinations, Rev.1
OP-604, Diesel Generators “A” and “B,” Rev. 70
OMM-001-11, Log Keeping
REG-NGGC-0001, Employee Concerns Program

NCRs Priority 1

272388, 270624, 269817, 267830, 252624, 251128, 247492, 243840, 243648, 242583, 242158, 242128, 239331, 236014, 233172, 231589, 221343, 219376, 216145, 210311, 203613, 199717, 198534, 198537, 179668, 165893

NCRs Priority 2

281842, 278341, 277197, 275444, 274104, 274101, 274067, 274065, 274063, 274049, 274021, 272069, 271566, 270408, 270113, 269817, 269332, 267013, 264908, 264211, 262601, 261404, 260663, 260133, 259991, 259706, 258487, 258467, 258402, 258208, 258148, 257232, 254026, 251335, 251179, 250367, 250358, 249813, 247687, 247169, 245292, 242273, 241618, 240001, 239915, 238666, 237349, 236936, 233313, 233189, 231729, 229492, 227011, 225897, 224621, 224543, 221243, 219644, 218715, 215864, 212554, 211962, 210891, 210428, 208064, 207563, 207134, 206073, 204448, 202939, 201444, 201093, 199520, 199518, 199146, 197505, 197159, 193477, 192736, 190912, 190854, 189229, 185484, 185138, 183498, 181896, 180122, 179911, 176109, 139209, 129041, 089273, 082961, 078025, 070967

NCRs Priority 3

270113, 260432, 257935, 250804, 250279, 249419, 245645, 243697, 242754, 236447, 235101, 233014, 233005, 225463, 223804, 223780, 211985, 211385, 207995, 196652

Priority 5

260004, 250383, 243598, 242522, 229277

Work Orders

874798, 976739, 1070188, 1127455, 1139915, 1161211, 1177532, 1175330, 1291824, 1335038, 1139915, 1335039, 1335040, 1135038, 1070188, 1083332, 1177532, 0783163-01, 0793674-01/2/3/4/5/6/7/8/9/10, 0079926, 0196134, 0862317, 0976074, 1016935, 1017001, 1017003, 1102640, 1116661, 1122890, 1122891, 1122995, 1127454, 1127879, 1127880, 1304838, 1305679, 1309087, 1309712, 1312838, 1312851, 1312854, 1312856, 01172953, 01095626, 01300404, 01341084, 01329283, 0015026, 00775233

Self-Assessments

Assessment Number 176334, Maintenance Rule (a)(3) Periodic Assessment
Assessment Number 256902, Self-Assessment of Self Evaluation
Assessment Number 213601, Self-Assessment of Self Evaluation
Assessment Number 257266, Self-Assessment, Observation Program / Human Performance
Robinson Nuclear Plant Self Evaluation Assessment Report R-SE-06-01
Robinson Nuclear Plant Nuclear Assessment R-ISI-07-01
Robinson Nuclear Plant Nuclear Assessment R-SC-07-01
Robinson Nuclear Plant Nuclear Assessment R-MA-07-01
Robinson Nuclear Plant Nuclear Assessment R-OM-07-02
Performance Evaluation Support Assessment Report 07-11-SW-R

Drawings

5379-3368, Emergency Generator Start & Bus Clearing, Rev. 9
G-190204, Emergency Diesel Generator System Flow Diagram, Sheet 1 of 3, Rev. 31
G-190204, Emergency Diesel Generator System Flow Diagram, Sheet 2 of 3, Rev. 18
G-190204, Emergency Diesel Generator System Flow Diagram, Sheet 3 of 3, Rev. 18

Other Documents

Design Basis Document: Service Water System
Engineering Disposition 51019
Engineering Service Request 9500152
EC62983, DSDG battery replacement
EC52696, Service Water Cabling Replacement
Maintenance Rule Expert Panel 1/26/06 Meeting Minutes
Maintenance Rule Expert Panel 11/13/06 Meeting Minutes
Service Water Temperature Trends from 6/2/07 – 6/1/08
System Health Report for Component Cooling Water dated 6/13/07, 1/13/07, 3/20/08
System Health Report for Service Water dated: 1/13/07, 7/25/07, 3/20/08
System Health Report for Auxiliary Feed Water, Quarter 1, 2008

System Health Report for Chemical Volume and Control, Quarter 2008
System Health Report for Reactor Protection System, Quarter 1, 2008
System Health Report for Residual Heat Removal, Quarter 1, 2008
System Health Report for Safety Injection, Quarter 1, 2008
System Health Report for Reactor Protection System, Quarter 2, 2008
System Health Report for Reactor Protection and Safeguards, 7/30/2007
System Health Report for Reactor Protection and Safeguards, 1/31/2007
System Health Report for Reactor Protection and Safeguards, 5/23/06
System Health Report for Reactor Protection and Safeguards, 1/30/2006
SD-005, Emergency Diesel Generators, Rev. 11