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SUBJECT: Submits supplemental response to violation noted in Insp
Rept 50-261/89-11.

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Carolina Power & Light Company

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United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/89-11 SUPPLEMENTAL RESPONSE

Gentlemen:

By letter dated October 16, 1989, Carolina Power and Light Company (CP&L) provided a reply to the Notice of Violation identified by NRC Inspection Report No. 50-261/89-11. One of the violations documented within this Inspection Report, 50-261/89-11-02, "Inadequate Plant Programs for Controlling and Documenting the Torquing Process (paragraph 4.a)," cited examples of maintenance activities where torquing deficiencies were identified. The deficiencies noted were determined to be generic for much of the maintenance performed onsite where torquing is applicable. In response to this violation, as part of the corrective actions which will be taken to avoid further violations, CP&L stated that a maintenance procedure would be developed to provide specific instructions to maintenance personnel with regard to torquing. This procedure was to be developed by April 2, 1990.

Contrary to the commitment made in the initial response, this procedure was not fully completed by April 2, 1990. This is primarily attributed to an insufficient dedication of resources to ensure development and implementation of this torquing procedure by the specified due date. Also, a high priority was placed on a thorough review and comment cycle such that a workable, quality torquing procedure could be implemented. For these reasons, the procedure was not ready for implementation by the specified due date. This torquing procedure will be finalized and approved by May 25, 1990.

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A second violation documented within this Inspection Report, 50-261/89-11-04, "Failure to Follow Procedures While Performing Maintenance (paragraph 4.a)," identified deficiencies with regard to the failure to follow approved procedures, and described three occurrences where procedures were not properly utilized in the performance of maintenance activities. In response to this violation, CP&L stated that the following corrective actions would be taken to avoid further violations:

1. To stress the importance of attention to detail, procedure adherence, and communications, the occurrences, i.e., examples of failures to follow procedure, would be reviewed with all Maintenance Planners, Maintenance Foremen, Mechanics, and other appropriate members of Maintenance Management. This review was to be completed by December 31, 1989.
2. Maintenance procedure CM-127 would be revised to address situations where valve leakage continues after reaching 115% of nominal torque. This revision would also incorporate compensatory actions to be taken if 115% of nominal torque is exceeded to stop valve leakage, with the valve subsequently passing its required post maintenance testing. This procedure revision was to have been completed by December 31, 1989.

Contrary to the commitments made in the initial response, these corrective actions were not completed by the specified due dates. This situation is, in part, attributed to an administrative error with regard to identification and tracking of these commitments. A further contributing factor was the dedication of resources to other higher priority activities related to the Auxiliary Feedwater System forced outage and other emergent work items. The review of occurrences by appropriate Maintenance personnel was completed on January 26, 1990. The revision to CM-127 will be completed by May 25, 1990.

Also, the letter transmitting Inspection Report No. 89-11 required that CP&L respond to each Inspector Follow-up Item (IFI) identified within the report. The response to each IFI was to include a statement of the intended corrective actions and the dates that these actions would be completed. By letter dated November 15, 1989, CP&L provided a supplemental response to Inspection Report No. 89-11 which addressed each IFI. Contained within this letter was a response to IFI 89-11-14, "Review Implementation of MOD-018, Revision 4, and MOD-013, Revision 5, in Temporary Modification Program (paragraph 3.g)," which stated that a site-specific procedure would be implemented for performance of 10CFR50.59 safety reviews. Implementation of this procedure was to follow completion of an on-going corporate program for upgrading and standardizing the safety review process at CP&L's nuclear sites. This procedure was to be implemented by March 2, 1990.

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Contrary to the commitment made within the supplemental response, this procedure was not implemented by March 2, 1990. Based on the on-going activities of the company-wide 10CFR50.59 Task Force, additional time was necessary for procedure upgrade and for training of qualified safety reviewers prior to procedure implementation. As such, the revised due date for implementation of the site-specific procedure will be June 15, 1990.

CP&L recognizes that the above four examples of failures to complete corrective actions by the dates committed to the NRC represent a lack of management attention to these issues and a breakdown in our commitment tracking program. Corrective action is being taken to address this situation. It is CP&L's intent that actions committed to the NRC will be completed no later than the committed date or a written request for extension will be submitted to the NRC before that date.

CP&L has evaluated the missed dates discussed above, and the requested extensions, and believes that these changes have minimal safety significance.

Should you have any questions regarding this supplemental response or any previous submittal associated with Inspection Report No. 89-11, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



C. R. Dietz
Manager
Robinson Nuclear Project Department

CTB:lht

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO