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 AUTH. NAME AUTHOR AFFILIATION
 DIETZ, C.R. Carolina Power & Light Co.
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SUBJECT: Responds to violations noted in Insp Rept 50-261/90-02.

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ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

APR. 09 1990

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Serial: RNP/90-1169

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

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NRC INSPECTION REPORT NO. 50-261/90-02 REPLY TO NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation identified by NRC Inspection Report No. 50-261/90-02.

Severity Level IV Violation (RII-90-02-02-SI4)

Technical Specification 6.5.1.1.1.c requires written procedures be implemented for surveillance and test activities of safety-related equipment. Written procedure OST-007, Nuclear Instrumentation Comparator Channel, revision 4, provides instructions for testing the nuclear power range monitors. Step 7.1.6 required only the bistables associated with the channel being tested be placed in the trip mode.

Contrary to the above, written procedure OST-007, step 7.1.6 was not properly implemented in that, a bistable associated with nuclear power range channel II was tripped while nuclear power range channel I was being tested. This resulted in a reactor trip.

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Reply

1. Admission or Denial of the Violation

CP&L acknowledges the violation.

2. Reason for the Violation

Operations Surveillance Test, OST-007, "Nuclear Instrumentation Comparator Channel," is performed biweekly when the reactor is at power to verify appropriate alarms are received upon a power range channel deviation of 2% of full power. This test requires tripping of reactor trip bistables for the power range nuclear instrumentation channel being tested. While performing steps for testing the first channel, N-41, the operator tripped the associated bistables for Protection Channel I. The operator then inadvertently tripped the bistables associated with N-42 (Protection Channel II). This fulfilled the required logic to initiate a Reactor Protection System (RPS) actuation.

The primary cause of this event was a personnel error. This error was the result of inadequate focus on each step of the surveillance test, and a failure to apply self-checking techniques during performance of this test. In addition, nuclear instrumentation surveillance tests similar to OST-007 require that rod stop bistables be tripped for the channel being tested. Based on these similar tests, the operator anticipated that the rod stop bistables for N-41 would be tripped in addition to the reactor trip bistables which had already been tripped. This preconception with regard to the testing sequence further contributed to the mispositioning of the Protection Channel II bistables.

A contributing factor to this event was the format of the surveillance test procedure. OST-007 provides four columns for step signoffs, one for each of the four channels of power range instrumentation. As sequential steps are performed, they may or may not apply to the channel being tested. The OST does not contain clear, well-defined separation between signoffs for common steps which are applicable to independent trains or channels. Therefore, the operator must recognize whether the step to be performed is applicable to the channel being tested.

3. Corrective Steps Which Have Been Taken and the Results Achieved

The responsible individual has been counseled with regard to procedure adherence and attention to detail. Also, the Manager - Operations has communicated to operations personnel the importance of promptly identifying and correcting situations which might later result in a personnel error or injury.

Also, a review has been completed to establish and document the aspects of human factors, procedure format, and work practices which may have contributed to the occurrence of this event. The corrective actions identified by this review are provided below as the Corrective Steps Which Will Be Taken to Avoid Further Violations.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

The primary contributing factor was identified as a personnel error, which in turn was the result of a failure to focus on each step of the surveillance test procedure. In addition, the technique of self-checking was not utilized during performance of this test. To further address this issue, the following practices will be reinforced to operations personnel as part of the Operator Retraining program:

- a. The importance of procedure review prior to performing any actions required by the procedure.
- b. The need to anticipate upcoming steps, but thoroughly verify actions prior to proceeding; do not allow overfamiliarity to reduce attention to detail.
- c. The importance of ensuring that, prior to manipulation of any component or switch, it is the proper component or switch, and to anticipate the plant or system response to this manipulation.

This training will be completed by July 13, 1990.

To address the specific contributing factors associated with OST-007, a permanent procedure revision will be prepared and implemented. This revision will ensure that steps involving the operation of bistables are clear and well-defined. Also, appropriate Cautions and Notes will be included to emphasize the importance of only tripping bistables associated with the channel being tested. These changes to OST-007 will help to ensure that procedure format does not result, either directly or indirectly, in a personnel error or reactor trip. This procedure revision will be completed by July 13, 1990.

Letter to the United States Nuclear Regulatory Commission
Serial: RNP/90-1169
Page 4

5. Date When Full Compliance Will Be Achieved

The dates for completion of the corrective actions described above are provided with the associated corrective action description.

Should you have any questions concerning this submittal, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



C. R. Dietz
Manager
Robinson Nuclear Project Department

CTB:dwm

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