UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-261/90-04

Licensee: Carolina Power and Light Company
P. O. Box 1551
Raleigh, NC 27602

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

Facility Name: H. B. Robinson

Inspection Conducted: March 19-23, 1990

Inspector: R. W. Wright 4/4/90
R. W. Wright Date Signed

Approved by: F. Jape 4/4/90
F. Jape, Section Chief Date Signed
Quality Performance Section
Operations Branch
Division of Reactor Safety

SUMMARY

Scope:

This routine, unannounced inspection was conducted in the areas of operational safety verification, commercial grade procurement, and licensee action on previously identified inspection findings.

Results:

In the areas inspected, violations or deviations were not identified. Control room operations and demeanor were adequate during this reporting period as demonstrated by visual observations, review of records and discussions with selected shift personnel. The licensee has been implementing a commercial grade procurement program meeting the guidelines of the Electrical Power Research Institute NP-5652 since January 1, 1990. Additionally, a program for ascertaining the acceptability of commercial grade items bought prior to January 1, 1990, is being considered.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

S. Clark, Supervisor, Procurement Engineering
D. Crook, Senior Specialist, Regulatory Compliance
*C. Dietz, Manager, Robinson Nuclear Plant
R. Femal, Shift Foreman, Operations
*S. Griggs, Technical Aide, Regulatory Compliance
*E. Harris, Manager, Onsite Nuclear Safety
M. Heath, Supervisor, Modifications Liaison, Outage Management
*J. Kloosterman, Director, Regulatory Compliance
D. Knight, Shift Foreman, Operations
*R. Morgan, Plant General Manager
M. Page, Manager, Technical Support
F. Roy, Environmental Qualification Coordinator, Technical Support
D. Seagle, Shift Foreman, Operations
*J. Sheppard, Manager, Operations
R. Smith, Manager, Maintenance
C. Winters, Shift Foreman, Operations
*H. Young, Director, Quality Assurance/Quality Control

Other licensee employees contacted during this inspection included craftsmen, engineers, operators, technicians, and administrative personnel.

Other Organizations

R. Lo, Project Manager, NRR

*Attended exit interview

2. Operational Safety Verification (71707)

The nuclear unit was operated at 60% power, approximately 410 MWe for fuel conservation purposes throughout the reporting period. The inspector reviewed plant operations during the inspection period to verify conformance with applicable regulatory requirements. Control room logs, shift supervisors logs, shift turnover records, minimum equipment lists, equipment inoperable records and completed operational surveillance test reports were routinely examined during various shifts. Interviews were conducted with plant operations, maintenance, design, and regulatory compliance personnel.

Activities within the control room were monitored during shifts and at shift changes. The inspector observed shift turnovers on several occasions to verify continuity of plant status, operational problems, and other pertinent plant information. The inspector verified that operational shift staffing met or exceeded the hot operational staffing complement specified by procedure OMM-001 and plant Technical Specification requirements. The control room operations were being conducted in an orderly, professional manner and access to the control room was controlled.

Through work observations and discussions with the Operations Staff members, the inspector verified that the staff was knowledgeable of plant conditions, responded properly to alarms, adhered to procedures and applicable administrative controls, were cognizant of in-process surveillance and maintenance activities, and aware of inoperable equipment status. Upper management presence was visible in the control room in that the inspector noticed the Plant General Manager observing control room operations and reviewing Shift Foreman Logs.

The inspector attended the Plant Nuclear Safety Committee (PNSC) meeting conducted on March 21, 1990. A quorum was present to review the following items on the agenda: recent procedure changes, modifications issued, Technical Specification violations, reportable occurrences, nonconformance report status, significant condition report closeouts and various old and new PNSC items. The meeting was beneficial in that it provided the PNSC members and the acting resident inspector an effective means for assessing plant status, along with an overview evaluation of plant operational safety concerns that were being addressed.

The inspector observed a portion of auxiliary steam AS-2285 valve repacking using the Chesterton Packing System which was performed under Work Request WR/JO 89CKR381 in accordance with Procedure CM-127, Revision 2.

The inspector and his Section Chief made inquiries concerning the chronology and licensee's preliminary plans for corrective action for the recent licensee event LER 90-006, Breach of Containment Due to Failure of the Personnel Air Lock. Discussions concerning this repetitive matter were conducted with Technical Support, Operations and Regulatory Compliance management personnel. The inspectors also met with the Manager Onsite Nuclear Safety to discuss the status of completed Safety System Functional Inspections and Design Bases Reconstitution efforts to date, and what is planned for plant Robinson in these areas in the future to assist the NRC inspection effort.

3. Commercial Grade Procurement (38703)

The licensee's Nonconformance Report NCR 88/096 issued July 18, 1988 identified that the Robinson Nuclear Plant did not have a formal dedication program or an adequate procurement program for commercial grade items. Discussions with the Procurement Engineering Supervisor disclosed that a commercial grade dedication program with approved procedures reportedly meeting Electrical Power Research Institute (EPRI) NP-5652 guidelines has been implemented for all Robinson commercial grade procurements purchased since January 1, 1990. Additionally, the site is currently considering various methods for ascertaining the acceptability of commercial grade items brought prior to January 1, 1990.

4. Actions on Previous Inspection Findings (92701) (92702)

a. (Closed) VIO 261/88-01-02, Failure to Perform Post-Modification Testing

The licensee's reponse dated May 13, 1988, was considered acceptable by Region II. Valve closure time was a specified parameter in the design basis document for Modification M-912, Replacement of Pressurizer PORV Block Valves. However, it was subsequently determined not to be a critical parameter and was therefore not needed in the acceptance testing. This exclusion of the closure time parameter should have been justified or it should have been included in the acceptance test but neither was done. Procedure MOD-005, Modification Package Development and Revision was revised to require a functional test of a modified system or provide justification for any lack of such testing in the safety evaluation. The inspector reviewed the above revised procedure and examined the Training Report documentation that ascertained responsible design personnel were trained on May 12, 1988, to the subject revision. This review and training was used to re-enforce the cognizant engineers' awareness of the importance of adequate post-modification testing.

Special Procedure SP-781, for testing Auxiliary Feedwater (AFW) Pumps A and B was subsequently developed and used to functionally test AFW Pump B (Modification M-920) on June 15, 1987. The test results were reviewed and accepted by the Operating Supervisor on June 16, 1987. Review of Plant Operational Experience Report (POER) 87-4236 which described the subject pump's failure to start was declared mandatory by all personnel associated with writing modification acceptance tests. This report stressed the importance of functional testing to demonstrate system operability.

b. (Closed) VIO 261/88-01-03, Failure To Maintain Records

The licensee's response dated May 13, 1988, was considered acceptable by Region II. The inspector examined the revisions made to Procedure OMM-001, Operations - Conduct of Operations, which now requires all logs to be maintained in chronological sequence so that events can be more easily reconstructed. Increased awareness of proper logging requirements has been enhanced by adding additional instructions in the Operating Supervisors Directive and Information Book which is kept in the Control Room. Discussions with several shift foremen verified that Operations Management has stressed and continues to stress the importance of accurate meaningful logging practices. The inspector examined various Unit 2 Shift Foremen and Control Operator Logs documented during the inspection period and concluded they met Procedure OMM-001 logging requirements. Objective evidence of improvement in the depth and quality of Operational logging techniques can be seen by review of the Shift Foreman's Log dated March 19, 1990, 0700-1900 hrs. This log gives an accurate chronology of the activities surrounding a newly generated licensee event LER 90-006.

c. (Closed) VIO 261/88-01-04, Failure to Follow Procedures (Three Parts)

The licensee's response dated May 13, 1988, was considered acceptable by Region II.

PART 1: Maintenance Management Manual Procedure MMM-013, has been deleted and Procedure MOD-018, Temporary Equipment Modifications has been implemented in its place to ensure a thorough technical review of any temporary modification installed in operable structures, components or systems. This procedure was developed to be more consistent with other design change processes in that it reviews temporary changes for their effect on the FSAR, TS, approved plant drawings, plant valve lists, system descriptions and associated procedures. The inspector examined the above procedure and verified that FSAR Change No. A7-042 did in fact get incorporated in Amendment No. 7 of Figure 6.3.2.1 of the FSAR to reflect current configuration of valves SI-856 A and B for normal operation. A subsequent permanent modification (M-943) issued January 1988 replaced temporary repair TRP 86-01 during the 1988 refueling outage.

PART 2: Maintenance supervision took immediate corrective action by closing out completed corrective action records or assigning new target completion dates which were justified. Since this violation was cited, maintenance has changed the way it handles corrective actions.

There has been a significant turnover of maintenance engineering personnel and Procedure MMM-011 was revised and its title changed to, Maintenance Corrective Action Subprogram. This procedure details a systematic method to identify, screen, evaluate, and track corrective action of potential/actual adverse conditions, and adverse trends, both nonsignificant and significant, in accordance with Plant Procedure PLP-026, Corrective Action Program. Old problems were formally tracked by hand. Current methodology utilizes computer program methods which greatly enhances the identification and tracking of adverse trends and repetitive items. Additionally, in accordance with the December 11, 1989, Memorandum to Unit 2 Maintenance Supervisors from the Maintenance Manager, Maintenance has formed a Corrective Action Review Board. Their mission is to meet one hour per week to review for disposition all repetitive failures, adverse trends, non-compliance reports and any other subject matter that may require Maintenance Management attention.

PART 3: Licensee Commitment 88RO216 resulted in Procedure OMM-1 being revised to be more specific rather than generally defining the duties and responsibilities of the Shift Technical Advisor. This revision also made appropriate changes to other job positions in the Operations Unit to ensure the accuracy of their current specific functions. Operations Unit completed their review (Commitment 88RO289) of other Operations Management Procedures for inconsistencies between functions and positions on August 26, 1988, and no other corrections were deemed necessary.

d. (Closed) UNR 261/88-01-05, Commercial Grade Procurement

Discussions with the Environmental Qualification (EQ) Coordinator disclosed the subject Scotch 70 tape was eventually used on drain wire splices which are considered non-EQ applications. Since the subject procured tape was bought to existing approved procedures and used in a non-EQ application, no further review of this matter is considered necessary.

5. Exit Interview

The inspection scope and results were summarized on March 23, 1990, with those persons indicated in paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. Proprietary information is not contained in this report. Dissenting comments were not received from the licensee.

The following open items were reviewed and closed:

Violation 50-261/88-01-02, Failure to Perform Post-Modification Testing
Violation 50-261/88-01-03, Failure to Maintain Records
Violation 50-261/88-01-04, Failure to Follow Procedures
Unresolved Item 50-261/88-01-05, Commercial Grade Procurement