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United States Nuclear Regulatory Commission
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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. 50-261/89-10 SUPPLEMENTAL RESPONSE

Gentlemen:

By letter dated August 7, 1989, Carolina Power and Light Company (CP&L) provided a response to the Notice of Violation (NOV) identified by NRC Inspection Report No. 50-261/89-10. This violation identified three examples of conditions adverse to quality which were not promptly identified and corrected. This submittal provides supplemental information regarding the results of root cause analysis and corrective actions taken in response to the examples identified within the NOV. Also, certain commitments made within the original response are updated, and the due dates associated with these commitments have been revised. Submittal of this supplement satisfies a commitment made within the original response to the NOV.

One of the examples provided within the NOV was the failure to promptly identify and correct leakage from the Component Cooling Water (CCW) System. The initial response to the NOV stated that this occurrence would be reviewed within the plant's Corrective Action Program to establish causal factors and root cause. As such, Significant Condition Report (SCR) No. 89-050 was initiated and subsequently divided into two functional areas.

First, a review was to be performed to examine the elements of human performance which resulted in the failure to promptly identify the CCW System leak. This has been accomplished within the Human Performance Enhancement System (HPES) by HPES Report No. 89-007, dated November 13, 1989. The results of this review are provided as Attachment I.

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Second, a determination was to be made regarding the root cause for the leaking tubes within the CCW System heat exchanger. However, resolution of this issue will not be feasible without removing this equipment from service to allow testing and examination. This activity will be performed during the 1990 Refueling Outage which is currently scheduled to begin in September. Following performance of these tests, an assessment will be required, with the subsequent development of a corrective action plan. These activities are scheduled to be completed by March 29, 1991.

As stated within the initial response to the NOV, this Supplemental Response was to be submitted within 30 days of completion of the Corrective Action Program review of this event. However, the root cause analysis associated with SCR No. 89-050 will not be fully completed until the heat exchanger tube failure mechanism has been identified. As stated previously, an extended time schedule is required for completion of this activity. Since the completion of HPES Report No. 89-007 provides sufficient information to address the failure to promptly identify the CCW System leak, it is appropriate to provide this Supplemental Response prior to formal completion of the root cause analysis. This information satisfies the commitment made within the initial response to the NOV; no further submittals are planned in response to this Inspection Report.

A second example provided within the NOV involved the failure to take prompt corrective action with regard to CC-832, CCW surge tank makeup valve. The failure to take prompt corrective action with regard to this valve resulted, in part, from the failure to complete an associated Engineering Work Request (EWR) in a timely manner. As part of the corrective actions to address this occurrence, a pilot program was to examine the feasibility of incorporating EWR tracking and prioritization into the existing, computer-based Automated Maintenance Management System (AMMS). A commitment was made within the initial response to the NOV to review the status of the pilot program within this Supplemental Response. Attachment II provides the review of this pilot program for computer-based EWR tracking.

Also, within the initial response to the NOV, a description was provided of refinements intended to improve the overall effectiveness of the Plant Corrective Action Program. Attachment III provides a brief status of activities supporting implementation of each refinement. Also, where necessary and appropriate for each refinement, a revised date for completion is provided.

The information provided within this supplement fulfills commitments made within our original response to NRC Inspection Report No. 50-261/89-10. No further submittals are planned in response to this Inspection Report.

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

Very truly yours,



C. R. Dietz
Manager
Robinson Nuclear Project Department

CTB:sgk

Attachments

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

Attachment I

Results of Human Performance Enhancement System Report No. 89-007

I. Summary of Causes

- A. Due to the larger number of licensed operators, combined with longer 12 hour shifts, individuals stand fewer watches at the RTGB, making it more difficult for the individual to detect trends.
- B. The failure to follow procedures which outline the requirements for maintaining logs contributed to the trend not being promptly identified.
- C. Although procedural requirements for logging and for review of logs are included in training lectures, practical exercises do not verify or evaluate individual performance.
- D. Management direction has been provided concerning the need for complete and accurate logs, however, evaluation of individual performance does not stress this area.

II. Corrective Actions

- A. Stress the need for reactor operators and shift foremen to review previous shift's logs back to the point at which they last stood watch or at least seven days prior to the current watch.
- B. Include evaluation of logging practices in Operator Quarterly Evaluations.
- C. Assign one individual to ensure the consistency of logging practices between shifts.
- D. Include verification of logging practices in simulator scenarios involving "routine operation."
- E. Notify Chemistry and have samples taken to ensure chromates are within required range following each make-up to the CCW surge tank.

Attachment II

Review/Status of Pilot Program for Computer-Based EWR Tracking

The pilot program for computer-based EWR tracking was run from August 1989 through November 1989, and was focused within a subunit of the Technical Support Unit. This pilot program utilized the existing Automated Maintenance Management System (AMMS) without restructuring or reformatting for the specific needs of the Technical Support staff. The overall assessment of this pilot application of AMMS was that:

1. It was successful in tracking the backlog of work activities.
2. It allowed scheduling of work, and documented the status and completion of work.
3. It allowed individuals initiating EWRs to view the status of work as it progressed through to completion.
4. It linked work history with work performed by the Technical Support staff.
5. It was manpower intensive and was not conducive to full utilization of engineering manpower.
6. The system was not considered the best for long term implementation.

Use of this system within the affected subunit is expected to be continued until a work management/work tracking system is approved for use throughout the Technical Support Unit. A commitment was made to develop and implement a Technical Support Work Management Program within CP&L's response, dated December 15, 1989, to the Notice of Violation and Imposition of Civil Penalty identified by Enforcement Action EA 89-188. To address this commitment, a different system designed for the Technical Support Unit and its key interfaces is under development. As stated within a Supplemental Reply to EA 89-188, dated June 4, 1990, an operational Work Management System will be implemented by October 26, 1990.

Attachment III

Plant Corrective Action Program Refinements

1. Streamline PLP-026 and the Significant Condition Report form.

A corporate Corrective Action Program (CAP) Task Force was formed in January 1990 to evaluate programs at the three CP&L nuclear sites. This Task Force will make recommendations to bring consistency and improvements to all three programs. Also, the Task Force is reworking the process for identifying, evaluating, and correcting adverse conditions and trends. The original due date for this commitment was prior to the start of Refueling Outage No. 13. However, since implementation of Task Force recommendations will not be completed until December 31, 1990, the due date for this commitment will be revised to be consistent with the activities of the Task Force. Therefore, streamlining of PLP-026 and the Significant Condition Report form will be completed by December 31, 1990.

2. Incorporate solicited recommendations and comments for improvement from a Task Force of primary PLP-026 users.

Recommendations and comments have been solicited from PLP-026 users. These will be considered during implementation of recommendations provided by the corporate CAP Task Force. The original due date for completion of this item was also prior to the start of Refueling Outage No. 13. To be consistent with the activities of the Task Force, the due date for completion of this item will be revised to December 31, 1990.

3. Provide a weekly status to Plant Management of the status of outstanding Significant Condition Reports.

This report is being provided to Plant Management on a weekly basis.

4. Establish an effective trending program.

The corporate CAP Task Force is addressing trending as part of its efforts, and an associated implementation schedule is being developed. The original due date for establishing an effective trending program was prior to the start of Refueling Outage No. 13. Based on the activities of the Task Force, the due date for this commitment should be revised to December 31, 1990.

5. Identify and implement a site-wide root cause analysis process.

The site has adopted the Institute of Nuclear Power Operations (INPO) Human Performance Enhancement System (HPES) as a methodology for determining root cause for deficiencies which occur as a result of human performance. However, overall implementation of a site-wide root cause analysis process will be addressed as part of the corporate CAP Task Force activities. The original due date for this commitment was prior to the start of Refueling Outage No. 13. Based on the activities of the Task Force, the due date for this commitment should be revised to December 31, 1990.