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SUBJECT: Responds to violations noted in insp rept 50-261/91-05.
 Corrective actions: investigative team established to conduct
 root cause assessment & addl mgt emphasis placed on ensuring
 appropriate procedural controls.

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H. B. ROBINSON STEAM ELECTRIC PLANT
UNIT NO. 2
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NRC INSPECTION REPORT NO. 50-261/91-05 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in Inspection Report 50-261/91-05.

Severity Level IV Violation (RII-91-05-01)

10 CFR 50 Appendix B, Criteria V, requires activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances. Establishing a method to maintain the reactor vessel head flange temperature is an activity affecting quality.

Contrary to the above, documented instructions, procedures, or drawings were not provided, in that, documented instructions were not provided for the method to establish temporary heating equipment to maintain the reactor vessel head flange temperature. This resulted in an electrical fire inside containment on February 14, 1991.

JEO

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. The requirement to maintain the reactor vessel head flange within five degrees of the vessel flange studs was identified during a previous reactor head stud tensioning evolution in January, 1991. Although Plant procedures had been revised to reflect this requirement, no formal defined process had been identified as to how this task could be best accomplished. In order to meet the temperature requirement, the decision as to what process would be used to heat the head was developed through discussions with the individuals involved with the process on an informal basis. As the need for a defined process was not recognized, no formal review was performed to evaluate the conditions that would be created using temporary heating equipment.

2. The Corrective Steps That Have Been Taken and the Results Achieved

At the time of the fire, an investigation team was established in accordance with the Plants' Corrective Action Program to conduct a root cause assessment. Several short term corrective actions were taken to facilitate the investigation process, which included limiting access to the containment building, and preserving evidence via video tape for root cause assessment. Also, other temporary power configurations were inspected at that time to determine if additional fire hazards existed, and some changes were made as a result of this inspection.

The investigation team completed the root cause assessment, and a final Fire Investigation Report was issued. This report identifies that inadequate controls over the head heating process contributed to the occurrence of the fire. Additional management emphasis has since been placed on ensuring appropriate procedural controls are placed on quality related activities.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

The Fire Investigation Report contained several corrective action recommendations applicable to this violation. These recommendations include development of methodology for controls of temporary power installations. In addition, a technical analysis is to be performed to determine the proper methods and equipment necessary to maintain the five degree delta temperature requirements for reactor vessel head stud tensioning. This process will be incorporated into Plant procedures.

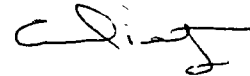
4. The Date When Full Compliance Will Be Achieved

As an interim measure, compensatory actions which have been taken are inclusion of inspection of temporary electrical devices in shift rounds until formal methods to control such configurations are developed and implemented. Formal methods for the control of temporary power configurations will be in place by March 31, 1992.

Appropriate methodology for maintaining reactor vessel head stud tensioning temperature requirements will be incorporated into Plant procedures prior to reactor vessel head reassembly activities during refueling outage 14.

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

Very truly yours,



Charles R. Dietz
Manager

Robinson Nuclear Project Department

RDC:td

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