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SUBJECT: Provides suppl response to notice of violation re Insp Rept 50-261/91-05.Corrective actions:investigation team completed root cause assessment & final fire investigation rept issued.

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H. B. ROBINSON STEAM ELECTRIC PLANT
UNIT NO. 2
DOCKET NO. 509-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/91-05 REPLY TO A NOTICE OF VIOLATION:
SUPPLEMENTAL RESPONSE

Gentlemen:

Carolina Power and Light Company hereby provides this revised response to the Notice of Violation identified in Inspection Report 50-261/91-05. This response supersedes the original response dated May 13, 1991, and provides additional information to address the corrective actions taken with regard to the three causal factors identified in the RNP Fire Investigation Report. The revised portions are identified by a vertical line in the right hand margin of the report.

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.

A001

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. Other options were discussed, but were eliminated due to fire protection concerns. 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 identified the following three primary causal factors that contributed to the fire:

1) Lack of a formal process for accomplishing the reactor head heating;
2) Overloaded temporary power hookups supplying light bulbs used for heating;
3) Quantities of combustible materials had been allowed to accumulate in the head storage area.

With regard to the first causal factor, management expectations have been re-emphasized by the Plant General Manager to the Unit Management level on how procedures are to be utilized in the operation and maintenance of Unit No. 2. These expectations include utilization of the Special Procedure process for situations not currently covered by existing procedures, and dictate that procedure usage is neither optional nor a matter of convenience.

Concerns with temporary power hookups were initially addressed to Fire Protection personnel by informal instructions for inspection of temporary electrical devices (such as extension cords, six outlet receptacles, drop lights, etc.) during normal shift rounds. This process has since been formalized as a special order to Operations personnel through the "Manager - Operations Directive and Information Book" process. This process will continue until procedural methods for controlling such configurations are in place.

The impact of utilization of combustible materials as a causal factor has been communicated to site personnel via a variety of Plant information systems. Noteworthy among these communication methods was a detailed review of the event and its causes by a site Fire Protection specialist with each Site Safety Council. This process effectively communicated details of the fire, as well as Management expectations for control of combustible materials, with the majority of Plant personnel.

In addition to the corrective actions taken to address each of the causal factors listed above, further management emphasis has been placed on ensuring appropriate procedural controls are in place for quality related activities. This has been accomplished, in part, through the Operational Experience Feedback (OEF) event report publication process. An OEF event report, explaining the three causal factors and why they were a problem, has been issued. OEF reports of this nature are widely distributed in order to communicate important information directly to all work levels at the Plant.

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

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:dwm

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