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 RECIP.NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Provides response to notice of violation re NRC Insp Rept 50-261/91-14. Corrective actions: shift supervisor log amended to include necessary entry into Section 3.0 of Tech Spec LCO.

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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. 50-261/91-14 REPLY TO A NOTICE OF VIOLATION:

Gentlemen:

Carolina Power and Light Company hereby provides this response to the Notice of Violation identified in Inspection Report 50-261/91-14.

Severity Level V Violation (RII-91-14-03)

Technical Specification 6.5.1.1.1.a requires written procedures be implemented for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Item 1.h. of Appendix A to Regulatory Guide 1.33 requires administrative procedures for log entries. Operating procedure OMM-001, Revision 25, requires the Shift Foreman's Log to include any entry into a limiting condition for operation (LCO).

Contrary to the above, procedure OMM-001 was not implemented in that, on May 19, 1991, entry into the Technical Specification 3.0 LCO was not documented in the Shift Foreman's Log.

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. The requirement to document an LCO entry in the Shift Supervisor's log was overlooked due to ongoing plant conditions. The Shift Supervisor's log entries at the time clearly indicate that the Technical Specifications were reviewed and that his efforts were concentrated on the immediate reportability of the event. The individual was aware at the time that Section 3.0 of the Technical Specifications applied as indicated in the Inspection Report. The violation occurred due to an administrative oversight.

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

The Shift Supervisor's Log has been amended to include the necessary entry into Section 3.0 of the Technical Specification LCO. Additionally, the Shift Supervisor involved has been counseled about the importance of ensuring log entries are complete and in accordance with OMM-001 and OMM-023.

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

Sufficient corrective action has been taken to avoid further violation. However, the circumstances of this event will be reviewed during operator retraining to ensure consistent understanding by all watchstanders of the requirement for logging LCO's.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved as described above.

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

PCHJ:kgs

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