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SUBJECT: Responds to NRC ltr re violations noted in Insp Rept
 50-261/92-02. Corrective actions: Adverse Condition Rept
 92-009 was initiated upon discovery of concern w/testing
 methodology & root cause analysis has been completed.

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NRC INSPECTION REPORT NO. 50-261/92-02: REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in NRC Inspection Report No. 50-261/92-02.

Severity Level IV Violation (RII-92-02-01)

10 CFR 50 Appendix B, Criterion V, requires in part that activities affecting quality be accomplished in accordance with procedures. Operations surveillance test procedure, OST-701, Inservice Inspection Valve Test, Revision 16, Section 6.3, requires that valve stroke times be measured from the time the control switch is actuated to the time the valve reaches the required position as determined by the valve position indicating lights.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedure OST-701 on December 17, 1991, in that valves PS-956F and G, primary sample system containment isolation valves, were not timed from control switch actuation to light indication as required. The failure to time the valves in the specified manner resulted in the valves not being declared inoperable as required by the procedure.

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REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. The violation was caused by a combination of human performance actions.

OST-701 was revised on August 30, 1991, changing the "Acceptance Criteria" methodology for valve stroke time measurement to only allow measurement determination to be made by valve position indicating lights. This revision did not ensure the procedure valve data sheet, which provides a column for the operator performing the test to indicate the choice of travel verification methodology used (stem travel or indicating lights), was appropriately changed. Thus, a procedural ambiguity was created as to the method of testing permitted by the procedure. Also, training on the procedure change was not provided to make Operations personnel aware of the new restriction to use indicating lights only for stroke time testing, as opposed to the previously allowed option of stem travel or indicating lights.

On December 17, 1991, Operations personnel performed stroke time testing on valves PS-956A through PS-956H, and PS-959 in accordance with the normal surveillance test schedule. All valves tested satisfactorily with the exception of PS-956F and PS-956G, which had problems with the position indicating lights. These valves were cycled again and the stroke timing was accomplished using stem travel, as previously allowed by the procedure acceptance criteria. Personnel involved in the test at that time were unaware that a procedural concern existed because the valve data sheet still provided a data point to indicate that the timing verification methodology by stem travel could be used. The test was determined to be satisfactorily completed based on stem travel verification. The timing data was entered on the test data sheet with a note that the valves were stroke timed by stem movement due to position indication light problems. Work requests were initiated to repair the indicating lights.

The ISI Coordinator detected the procedure violation during his review of the completed test data, and notified the Shift Supervisor of the concern. A partial OST-701 was then performed on the subject valves and based on position indicating lights, the valves failed their stroke time test. However, visual verification of stem travel was also performed, and found to be within the required ten seconds. Additionally, an Auxiliary Operator performing the test stated that the valves demonstrated full travel to the closed position by observation of the graduated position indicating devices on the respective valve stems.

Since steps 6.3 and 6.4 of OST-701 required declaring a valve inoperable if the desired change of position was not evident from the remote indicating lights, the valves were declared inoperable and the Technical Specification LCO was entered. A technical position on the use of switch-to-light testing was provided to the Shift Supervisor on January 13, 1992. This position stated that, while switch-to-light testing was the accepted methodology, in cases where position light indication problems exist, Section XI of the ASME Code would allow operability determinations to be made via alternate methods of verifying valve position change. However, other methods indicating evidence of valve position change were not proceduralized at that time.

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

Adverse Condition Report 92-009 was initiated upon discovery of the concern with the testing methodology, and a root cause analysis has been completed. In addition, on March 5, 1992, Operations personnel were provided by memorandum information concerning the procedure changes for valve stroke testing. This memorandum stated that if during testing, a valve does not meet its acceptance criteria using the switch-to-light timing method, the valve shall be declared inoperable and the required actions taken.

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

Surveillance procedures for Inservice Testing will be revised to eliminate the inconsistencies discovered between the test data sheets and the test acceptance criteria. In addition, Operations Management Manual Procedure OMM-015, "Operations Surveillance Testing", will be revised to incorporate other acceptable test methods specified by the IST Program for satisfying ASME Section XI code requirements that may be utilized when light indication is inoperable. Training on these procedure changes will be provided as appropriate.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the above procedural changes, which will be effective by October 31, 1992.

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Should you have any questions regarding this matter, please contact
Mr. C. T. Baucom at (803) 383-1253.

Very truly yours,



Charles R. Dietz
Vice President
Robinson Nuclear Project Department

RDC:dwm

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