

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9208280072 DOC. DATE: 92/08/20 NOTARIZED: NO DOCKET #
CIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light Co 05000261
AUTH. NAME AUTHOR AFFILIATION
DIETZ, C. R. Carolina Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-261/92-16.
Corrective actions: fuel oil filter configured properly, EDG
B satisfactorily tested & Mod 1128 revised to eliminate vent
path to atmosphere.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-1 PD	1 1	MOZAFARI, B	1 1
INTERNAL:	AEOD	1 1	AEOD/DEIB	2 2
	AEOD/DSP/TPAB	1 1	AEOD/TTC	1 1
	DEDRO	1 1	NRR MORISSEAU, D	1 1
	NRR/DLPQ/LHFBPT	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/DEAB	1 1	NRR/DREP/PEPB9H	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
	<u>REG FILE</u> 02	1 1	RGN2 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE, J. H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 22



Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

AUG 20 1992

Robinson File No.: 13510E

Serial: RNP/92-2230

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23

NRC INSPECTION REPORT NO. 50-261/92-16 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 50-261/92-16. This Inspection Report described occurrences which were identified as violations of NRC requirements.

Enclosure 1 provides a description of each occurrence, the causal factors and root cause identified for each, and a discussion of the corrective actions taken and planned to address each occurrence. In addition, the actions taken and planned to improve the effectiveness of the Maintenance Procedure Upgrade Program are provided.

Should you have any questions regarding this matter, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,


Charles R. Dietz
Vice President

Robinson Nuclear Project Department

RDC:sgk

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

9208280072 920820
PDR ADOCK 05000261
Q PDR

IE01

111

Severity Level IV Violation (RII-92-16-03)

Technical Specification 6.5.1.1.1 requires written procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, revision 2, February 1978. Appendix A paragraph 9 requires that maintenance which can affect the performance of safety related equipment be performed in accordance with written procedures appropriate to the circumstances. CM-303 was established to provide a written procedure for the installation of environmentally qualified taped splices. CM-508 was established to provide a written procedure to disassemble and reassemble the emergency diesel generator (EDG) fuel oil filter cartridge assembly.

Contrary to the above, maintenance procedures were not adequately established in that:

On June 16, 1992, CM-303 did not provide instructions to remove all non-qualified or braided jacket material from the splice area.

On May 26, 1992, the steps provided in CM-508 for the reassembly of the EDG fuel oil filter cartridge assembly were incorrectly sequenced. This contributed to the improper assembly of the B EDG fuel oil filter cartridge assembly and subsequent failure of the B EDG during testing.

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described.

- A. Corrective Maintenance Procedure CM-303, utilized for installation of Environmentally Qualified taped cable splices, has never required pulling back the braided jacket material prior to taping over the area to be spliced. This procedure was revised by the Maintenance Procedure Upgrade program on January 29, 1992, and this deficiency was not identified by the procedure writer or during the procedure review and approval process.
- B. The steps provided in procedure CM-508 for reassembly of the Emergency Diesel Generator (EDG) fuel oil filter cartridge assembly were incorrectly sequenced, and were not noted during the validation of the procedure after it had been revised by the Maintenance Procedure Upgrade Program. The procedure was validated on the "A" EDG, and was used as a "reference", as allowed by the Procedure Usage Cover Sheet, instead of being performed in a sequenced manner.

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

- A. Adverse Condition Report (ACR) 92-216 was initiated to include this condition within the Corrective Action Program. The Environmental Qualification System Engineer reviewed this condition and determined that problems may exist with EQ components having the potential for moisture intrusion that utilized CM-303 for splicing. These components were inspected, and corrections were made as necessary. Supplemental work instructions were added to the Technician's Work Request to pull back the cable braiding prior to the application of re-splice tape.
- B. The fuel oil filter was reconfigured properly and the "B" EDG was satisfactorily tested. The "A" EDG fuel oil filter was inspected, and the fuel oil filter was found to be properly installed. CM-508 was revised to reflect the proper sequence of steps for EDG fuel oil filter cartridge assembly. The Manager-Maintenance issued a memorandum on May 27, 1992 stating that the "use of procedures from the Procedure Upgrade Program must be carefully scrutinized the first time they are used." This memorandum further stated not to use any procedure usage cover sheet marked "Reference", but that invalidated procedures should be performed step-by-step. An additional memorandum was issued on July 24, 1992 which required the use of an experienced Technician capable of recognizing any inadequacies that may exist in an invalidated procedure.

The Plant General Manager has met with Maintenance personnel and has discussed his expectations concerning procedure usage and compliance. These discussions included the necessity to stop work when procedural deficiencies are encountered.

The Nuclear Assessment Department has conducted reviews of Maintenance procedure usage in the field, and has forwarded observations to Maintenance Management for their disposition.

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

- A. Adverse Condition Report 92-216 is currently under review. Upon completion of this review, CM-303 will be revised to adequately reflect the requirements for installation of environmentally qualified tape splices.
- B. A review will be conducted of Minor Adverse Condition Reports generated from June 1, 1991 to the present related to procedural problems. Further, the Procedure Upgrade Validation Sheets generated to date will be reviewed to assess the quality of upgraded procedures.

Based on information obtained from these tasks, a Trending Program will be established to monitor the quality of the Procedure Upgrade Program and to initiate corrective actions as necessary to maintain program quality.

In order to reinforce the necessity of performing a detailed and in-depth review of procedures, this violation and response will be reviewed by personnel responsible for Maintenance procedure technical reviews.

4. The Date When Full Compliance Will Be Achieved

Full compliance for the above violations will be achieved by December 31, 1992.

Additional Information

The failure to identify these deficiencies through the Maintenance Procedure Upgrade Program has been discussed with the Contract Procedure Writer Manager, stressing the necessity of accuracy of procedural information and attention to detail. Maintenance Supervision will continue to coach personnel in the proper use of new or upgraded procedures to ensure comprehensive validations. Procedure writers are aware that procedure quality cannot be sacrificed for schedular concerns. As such, Management will evaluate the schedule stated in our commitment to upgrade maintenance procedures to determine if an extension request will be necessary.

Severity Level IV Violation (RII-92-16-03)

B. 10 CFR 50 Appendix B Criterion V requires that activities affecting quality shall be prescribed by documented instructions appropriate to the circumstances. Modification M-1128 provided documented instructions for the reconfiguration of the safety injection cold leg injection containment isolation boundary.

Contrary to the above, M-1128 did not provide instructions appropriate to the circumstances in that the modification created a potential for an unmonitored release pathway during normal operation.

This is a Severity Level IV violation (Supplement I).

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. In order to adequately describe the reason for the violation, it is first necessary to discuss the background for Modification 1128.

On April 3, 1992, a condition was identified where containment penetrations P-62, P-63, and P-64 did not meet the redundant barrier requirements of General Design Criteria GDC-53. This condition was reported in Licensee Event Report 92-005. The resultant corrective action was the development of Modification 1128 which removed valve SI-857B, and procedurally altered the normal valve positions of the SI-867 and SI-870 valves. Due to this corrective action, SI-857A provides all of the overpressure protection for Class 1501 piping upstream of the SI-868 valves.

During startup from Refueling Outage 14, pressure was noted on the inlet side of SI-857A due to RCS leakage through downstream check valves. This was caused by the modifications' repositioning of the SI-870 valves to normally open when RCS pressures are greater than 1750 psi. Because the discharge from SI-857A returns to the RWST, which is vented to atmosphere, any leakage of the RCS coolant through SI-857A could result in an unmonitored release. Prior to the modification, the overpressure protection was provided by the removed SI-857B valve which discharged to the Auxiliary Building Sump.

The root cause evaluation has at this point identified two primary causal factors that resulted in the violation. First, the review process of the design package and the related procedure changes required for modification implementation did not identify the deficiency. This was in part due to not obtaining appropriate discipline reviews of both the modification and the resultant procedure changes. Although guidance is in place for selection of reviewers for plant changes which affect radioactive effluent releases, this guidance was not utilized. Secondly, the safety reviews of the Plant procedure changes noted in the modification as requiring update before operability did not identify the unmonitored release path. This was due to reliance on the previous safety reviews obtained for the modification package.

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

An Adverse Condition Report (ACR 92-204) was initiated in accordance with the Corrective Action Program to document the deficiency and to initiate an investigation to determine the root cause.

Immediate corrective action was taken to revise Modification 1128 to eliminate the vent path to atmosphere. The discharge line for safety relief valve SI-857A was routed to the floor drain in the Boron Injection Tank room, which was the same discharge point as for the previously removed SI-857B valve.

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

The Nuclear Plant Modification Program will be revised to strengthen the review process for modifications that may impact radiological releases. Additionally, Plant procedures governing the procedure change process will be revised to add reviewer selection criteria for changes that may result in the creation of an unmonitored radiological release.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the above actions by June 30, 1993.