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SUBJECT: Responds to NRC ltr re violations noted in insp rept
 50-261/92-34. Corrective actions: I&C Technicians &
 Supervisors have been made aware of appropriate actions to
 be taken in event that similar condition should arise.

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H. B. ROBINSON STEAM ELECTRIC PLANT
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NRC INSPECTION REPORT NO. 50-261/92-34 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation identified by NRC Inspection Report No. 50-261/92-34.

The enclosure to this letter provides a description of each occurrence, the causal factors and root causes identified for the violations, and a discussion of the corrective actions taken and planned.

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

Very truly yours,

Charles R. Dietz
Vice President

Robinson Nuclear Plant Department

DHB:lst

Enclosure

cc: S. D. Ebnetter
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INPO

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REPLY TO NOTICE OF VIOLATION

RII-92-34-01:

Technical Specification 6.5.1.1.1.a requires that procedures be implemented for activities referenced in Appendix A of Regulation Guide 1.33, Revision 2, February 1978. Appendix A item 8.a requires written procedures for calibration of safety-related instrumentation. Data sheet TIC-651 of Appendix B to the Calibration Program, MMM-006, specifies a three-point calibration of TIC-651. TIC-651 is used to ensure compliance with Technical Specification requirements on Spent Fuel Pit temperature.

Contrary to the above, on December 12, 1992, MMM-006, Appendix B, Calibration Data sheet TIC-651 was not implemented in that TIC-651 was calibrated at a single point instead of the specified three points.

REPLY

1. The reason for the violation

This violation was identified during the investigation into the Spent Fuel Pool low temperature event that was reported in LER 92-025.

The violation resulted from the physical inability to remove the temperature indicator probe from its installed location near the bottom of the Spent Fuel Pool. This condition was further aggravated by the Technician performing the calibration when he elected to perform a one-point calibration in lieu of the three-point calibration required and to annotate the calibration data sheet with the appropriate information to show the calibration method used. It has been concluded that neither the Technician, nor the Supervisor reviewing the calibration data sheet, recognized that the actions taken were inappropriate and that a design verification should have been conducted to determine the validity and acceptability of the one-point calibration.

2. The corrective steps that have been taken and the results achieved

The immediate corrective actions taken are identified in LER 92-025 and consisted of adjusting the cooling water flow to the Spent Fuel Pool Heat Exchanger, using a thermometer immersed in the pool water to monitor temperature, and installing temperature indicating equipment that can be maintained and calibrated.

3. The corrective steps that will be taken to avoid further violations

The long term corrective actions that have been taken to avoid further violations of this type are as follows:

The Instrumentation and Control (I&C) Technicians and the Supervisors have been made aware of the appropriate actions to be taken in the event that this or a similar condition should arise.

The Plant Operating Manual (POM) procedures, containing the Calibration Data Sheets, are presently under revision as part of the Maintenance Procedure Rewrite Program and any problems known at this time will be corrected under this program.

However, the most effective and comprehensive action to avoid further violations is to make I&C Technicians aware that calibration data sheets are controlled by the POM and changes require the same review and approval as any other POM procedure. This awareness has recently been accomplished. With this new awareness, calibration data sheets will be strictly adhered to during subsequent calibrations and will be appropriately revised when they are found to be in error or in need of improvement.

4. The date when full compliance will be achieved

Full compliance has been achieved.

RII-92-34-04:

Technical Specification 6.5.1.1.1.a requires that procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 2, 1978. Appendix A item 6.a requires procedures be established for combating a loss of coolant event. EPP-9 was established for the transition between the injection phase and recirculation phase of a loss of coolant event.

Contrary to the above, EPP-9 was not adequately established in that the procedure provided instructions for operation above the shutoff head of the Residual Heat Removal (RHR) pump without a time limitation to preclude damage to the RHR pump.

REPLY

1. The reason for the violation

The condition that could have caused a RHR pump to be operated in a valve line-up configuration where the pump would be dead-headed was created in Revision 9 to Procedure EPP-9 with the implementation of alternate hot leg injection, i.e. back-flowing through the normal RHR pump suction line to Reactor Coolant System Loop B. Revision 10 to Procedure EPP-9 was the result of the Modification that added individual mini-flow recirculation capability for each of the RHR pumps as a result of the common recirculation weak pump/strong pump issue.

The reviews conducted as part of the review and approval process of these revisions failed to identify the dead-heading condition that was created by the new valve line-up when considering a Small Break Loss Of Coolant Accident (SBLOCA). This failure has been attributed to inadequate technical review and the lack of recognition that an additional Design Verification should have been required.

2. The corrective steps that have been taken and the results achieved

The immediate corrective action consisted of implementation of Revision 11 to EPP-9 to eliminate the potential RHR pump dead-head condition and to apprise the operators of possible RHR pump damage if extended dead-headed operation were to occur.

3. The corrective steps that will be taken to avoid further violations

The action that will be taken to avoid further violations will be to develop and implement a Revision to Procedure AP-022, Document Change Procedure, that will add a specific question concerning valve line-up changes and how they relate to equipment performance to the Scope of Reviews Attachment and to provide clearer guidelines on when a Design Verification should be performed.

4. The date when full compliance will be achieved

Full compliance will be achieved by April 2, 1993.