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RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Provides response to violations noted in Insp Rept
50-261/93-11. Corrective actions: review conducted on
expedited basis, evaluation completed & approved by plant mgt
& corrective actions assignments accepted.

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Carolina Power & Light Company

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AUG - 2 1993

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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. 50-261/93-11 REPLY TO A NOTICE OF VIOLATIONS

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violations identified within NRC Inspection Report 50-261/93-11.

Provided within the Enclosure are the reasons for the violations, a description of the corrective actions taken and planned, and the dates when full compliance will be achieved.

Should you have any questions regarding this matter, please contact Mr. D. B. Waters at (803) 383-1802.

Very truly yours,

Charles R. Dietz
Vice President
Robinson Nuclear Plant

CTB:lkg

Enclosure

cc: Mr. S. D. Ebnetter
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REPLY TO A NOTICE OF VIOLATION

Severity Level IV Violation (RII-93-11-01)

10 CFR 50.72 (b)(2)(vi) requires that the NRC be notified within four hours of any event for which notification to other government agencies has been made.

Contrary to the above, on May 25, 1993, the NRC was not notified within 4 hours of notification of South Carolina Department of Health and Environmental Control that weir discharge temperature limits had been exceeded.

Reply

1. The Reason for the Violation

Carolina Power and Light Company (CP&L) acknowledges the subject violation.

Historically, the site had interpreted the criteria of 10 CFR 50.72(b)(2)(vi) as only being applicable to offsite releases of a radiological nature and did not consider discharge permit temperature exceedances as meeting this criteria. In addition, existing plant-specific procedural guidance for NRC reporting requirements provided no information to indicate the need or requirement to report such permit exceedances. As a result, the notification to the Department of Health and Environmental Control of the permit exceedances was not promptly recognized as being reportable to the NRC.

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

Adverse Condition Report (ACR) No. 93-089 was promptly initiated on May 28, 1993, following the identification of this occurrence. The review associated with this ACR involved a multi-disciplined team that conducted a comprehensive evaluation. This review was conducted on an expedited basis, and the evaluation was completed and approved by plant management and corrective action assignments accepted by responsible organizations by June 18, 1993.

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

In order to provide internal clarification regarding NRC reporting requirements, a site-specific review will be conducted to determine which events should be reportable pursuant to 10 CFR 50.72(b)(2)(vi), and to establish when the "four hour clock" should be started. The results of this review will be documented within the plant-specific procedure for reporting requirements, AP-030, "NRC Reporting Requirements."

In addition, a review of permits pertaining to the Robinson site will be performed to identify governmental reporting requirements. This review will also include a determination regarding which of these events or conditions would require additional reporting pursuant to 10 CFR 50.72.

Following completion of the above described corrective actions, a process will be developed to ensure that:

- Appropriate personnel are made aware of reportable conditions and the associated reporting requirements as identified and defined within upgraded plant procedures.
- Reports required by the NRC and other governmental agencies are completed by the appropriate CP&L organization in a timely manner.

Also, the Unit No. 1 and 2 Control Rooms have been provided with up-to-date, controlled copies of the Environmental Regulatory Permit Handbooks.

Finally, appropriate training on this occurrence and the associated corrective actions will be provided to Operations, Regulatory, and other appropriate personnel that will be involved in these processes.

4. The Date When Full Compliance Will Be Achieved

The Unit No. 1 and 2 Control Rooms were provided with up-to-date, controlled copies of the Environmental Regulatory Permit Handbooks on or before July 23, 1993.

The site-specific review to determine which events should be reportable pursuant to 10 CFR 50.72(b)(2)(vi), and to establish when the "four hour clock" should be started, will be completed, with appropriate revisions made to plant procedure AP-030, by September 30, 1993.

The review of permits pertaining to the Robinson site to identify governmental reporting requirements, including which of these events or conditions would require additional reporting pursuant to 10 CFR 50.72, will also be completed by September 30, 1993.

Development of the plant process to ensure that appropriate personnel are made aware of reportable conditions and the associated reporting requirements, and to ensure that reports required by the NRC and other governmental agencies are completed in a timely manner will be completed by March 2, 1994. This due date was established based upon consideration of the upcoming refueling outage, the lessened potential for permit problems during cooler fall and winter months, and coordination with the 1994 licensed operator requalification training schedule.

Appropriate training on this occurrence and the associated corrective actions will be provided to Operations, Regulatory, and other appropriate personnel that will be involved in these processes within four months of the implementation of the plant process described above, or by July 2, 1994.

REPLY TO A NOTICE OF VIOLATION

Severity Level IV Violation (RII-93-11-02)

Technical Specification 6.5.1.1.1.a requires that procedures be implemented for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Item 5 requires written procedures for alarm conditions of safety-related annunciators. Appendix A, Items 1.d, 3.d, and 3.n require written procedures pertaining to procedure adherence, temporary procedure changes, operation of the emergency core cooling system, and operation of the chemical and volume control system, respectively.

Technical Specification 6.5.1.1.5 requires that temporary changes to procedures, tests or experiments be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator License. The temporary change must be documented and reviewed within 21 days to determine if the change constitutes an unreviewed safety question.

Annunciator panel procedure APP-036-H2 was established to provide operator actions for Boric Acid Heat Trace Trouble Alarms. The procedure requires, in part, that responding personnel determine the cause of the alarm.

Operations Management Manual Procedure, OMM-001, Operations - Conduct of Operations, Section 5.9.2, Annunciator Panel Procedure Guidelines, provides guidance for implementing annunciator panel procedures and direction for unexpected alarm conditions for which annunciator procedures are not appropriate. The procedure requires, in part, that responding personnel take corrective actions and document their conclusions regarding the alarm.

Administrative Procedure, AP-006, Procedure Adherence, states in section 5.1, that adherence to approved plant operating procedures is mandatory. Section 5.2 delineates the only three mechanisms through which a deviation from an approved procedure can occur; those being either a permanent procedure change, a temporary procedure change, or a procedure deviation in the case of an emergency.

Contrary to the above;

1. On May 20, 1993, procedures in response to a Boric Acid Heat Trace Trouble alarm on a Technical Specification required circuit were not implemented in that: Operations personnel failed to determine the cause of the alarm as required by APP-036-H2; failed to document their conclusions regarding the alarm as required by Section 5.9.2 of OMM-001; and failed to take corrective actions as required by Section 5.16 of OMM-001. As a result, a heat trace circuit was allowed to remain in alarm for approximately 6 hours.

REPLY TO A NOTICE OF VIOLATION (Continued)

Severity Level IV Violation (Continued)

2. On May 27, 1993, during performance of Operations Surveillance Test Procedure OST-254, Residual Heat Removal System and RHR Loop Sampling Leak Test, control room operators did not follow the procedure in that when they were unsuccessful in getting valve HCV-142 to open when performing step 16 of section 7.1, they altered the chemical and volume control system's operations and configuration outside the scope of the applicable procedure; however, they did not initiate a temporary procedure change, nor discuss their actions with the shift supervisor.

Reply

1. The Reason for the Violation

CP&L acknowledges the subject violation.

Although the examples provided involve two separate and independent occurrences, certain important aspects of human performance, procedure adherence, and personal accountability are common to both. Therefore, although the circumstances of each occurrence have been and are being addressed independently, those issues which appear to be common to both will provide the substance of this response.

Based upon review of these occurrences, the issues which are common to both, and the reasons for this violation, are personnel errors and a failure to comply with procedures. A further contributing factor is procedural inadequacy in that operations shift personnel have exhibited weaknesses in the understanding and implementation of operational expectations set by management.

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

Corrective actions have been and are being taken to improve operations procedure adherence and to raise standards with regard to personnel expectations and performance. These actions were initiated primarily in response to a prior NRC violation, 92-22-01, issued by Inspection Report dated August 21, 1992, which involved the failure to properly implement Annunciator Panel Procedures. Specific corrective actions initiated in response to this violation are:

- The issuance of a six-step action plan for the improvement of annunciator response on March 30, 1993.
- The incorporation of more detailed and specific guidance regarding operator response to both Control Room and local annunciators within Revision 35 to OMM-001, "Operations - Conduct of Operations," which was made effective June 30, 1993.

- Review, evaluation, and implementation of any further corrective actions under ACR No. 92-301.

Due to the recent implementation of many of these corrective actions, their effectiveness will continue to be evaluated over the coming months.

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

Operations management will address the issues of procedure usage, appropriate response to procedure/equipment problems, how appropriate responses may vary based upon plant condition or the potential for equipment damage/personal injury, and troubleshooting equipment problems during the performance of a procedure versus with no procedural guidance in effect. This effort will result in the development of new or enhanced guidance which will be documented and provided to shift operations personnel.

In addition, operations management will schedule sessions with all operations shift personnel to discuss the issues identified as part of the above-described corrective action. This session will include two-way discussion, including examples solicited from shift personnel in advance. Consideration will be given to the utilization of case studies in which the operators are asked how they would respond to certain situations and the proposed responses are discussed and compared to management expectations. Such case studies may be drawn from industry events. The intent of this exercise will be the development of a more unified understanding among all operations personnel regarding implementation of management directives and expectations.

Finally, operations management will continue to evaluate the corrective actions initiated in response to NRC violation 92-22-01. This on-going process may result in the revision or enhancement of these actions to address the examples more recently identified.

4. The Date When Full Compliance Will Be Achieved

It has been determined that the most effective method for accomplishing the above corrective actions is through the licensed operator requalification training process using both classroom and simulator sessions. Based upon review of the current training schedule and the impacts presented by the upcoming refueling outage, these activities have been scheduled for completion by April 6, 1994.

REPLY TO A NOTICE OF VIOLATION

Severity Level IV Violation (RII-93-11-03)

Technical Specification 6.5.1.1.1.a requires that procedures be maintained for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Item 9 requires written procedures for maintenance that can affect the performance of safety-related equipment. Implicit in these requirements is the requisite that the procedures be technically and administratively adequate.

Corrective Maintenance Procedure CM-008 (Steam Driven Auxiliary Feedwater Pump, Turbine, and Auxiliaries Maintenance) was established to provide maintenance instructions for the steam driven auxiliary feedwater pump.

Contrary to the above, corrective maintenance procedure CM-008 was inadequate in that on November 25, 1992, a precaution to test the overspeed trip setpoint following renewal of the trip striker pin or striker spring was erroneously deleted from the procedure.

Reply

1. The Reason for the Violation

CP&L acknowledges the subject violation.

Review of this occurrence has identified two primary contributing factors that resulted in the inadvertent removal of this precaution from CM-008:

- a. As described within NRC Inspection Report No. 93-11, the precaution in question was included based upon the Onsite Nuclear Safety (ONS) review of INPO Significant Operating Experience Report (SOER) No. 89-01, "Testing of Steam Turbine/Pump Overspeed Trip Devices." However, the addition of this precaution to CM-008 did not include a reference to this SOER, nor was there any distinct or identifying information that indicated the source or basis for the original inclusion of this information. Therefore, individuals involved in the preparation and review of Revision 12 to CM-008 could not directly identify that this precaution was provided in response to industry operating experience and to satisfy an ONS Action Item.
- b. As part of the recently completed Maintenance Procedure Upgrade Project, enhanced guidance was developed and implemented to establish standards for preparing and maintaining maintenance procedures. This guidance was provided by Maintenance Management

. Manual Procedure, MMM-002, "Maintenance Procedure Preparation." Within this procedure, specific criteria were provided regarding the content and format of caution statements, in addition to explicit instructions indicating that action steps were not to be included within caution statements. As this guidance was implemented during the Maintenance Procedure Upgrade Project, many caution statements were found to contain action statements or requirements, and were subsequently reformatted into specific action steps. It is believed that the affected precaution within CM-008 was removed with the intention of including this information in a more properly formatted and structured procedure step. However, this information was inadvertently removed from the procedure altogether.

With the above contributing factors in consideration, it is clear that Revision 12 to CM-008 involved inadequate preparation and review, and can be equally attributed to personnel error. The removal of this information from CM-008 ultimately resulted from the failure to understand the basis and importance of the original precaution, combined with the failure to thoroughly and adequately review Revision 12 of the procedure.

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

As described within NRC Inspection Report No. 93-11, an investigation was promptly initiated to determine the significance and consequences of this occurrence. Based upon this review, it was established that no maintenance had been performed on the overspeed trip mechanism since the implementation of Revision 12 to CM-008. Accordingly, there were no adverse impacts on plant equipment or maintenance during the time that this precaution was removed from the procedure.

In addition, a revision to CM-008 was promptly initiated to include the precaution that had been inadvertently removed. The precaution was returned to CM-008 by Revision 13 which was made effective on June 4, 1993.

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

A review of safety-related mechanical procedures was initiated which involves a line-by-line comparison of procedures revised through the Maintenance Procedure Upgrade Project versus the old procedures. This involves review of approximately ninety (90) procedures. The purpose of this review is to determine whether the revision process has resulted in any further problems with regard to the inadvertent or improper omission or deletion of procedural information.

To assure that all procedure-related commitments have been properly incorporated into and maintained within maintenance procedures, a complete review of ONS and regulatory commitments from 1989 to the present is being performed. The intent of this review is to verify that no similar situations have occurred, and that commitments or requirements involving procedure revisions have been properly addressed on an on-going basis. In addition, this review should identify any procedural information that does not include the proper referencing or source noting, such that information related to prior commitments and requirements is readily identifiable.

Finally, to enhance the sensitivity of maintenance staff and procedure writers, training and counselling will be performed. This will include the importance of proper development and review of procedure revisions. In addition, emphasis will be placed upon ensuring the maintenance of procedural commitments or providing proper documentation for the alteration or removal of this information.

4. The Date When Full Compliance Will Be Achieved

The line-by-line review of safety-related mechanical procedures will be completed by November 30, 1993. Any discrepancies identified during this review will be properly prioritized and addressed.

Review of ONS and regulatory commitments from 1989 to the present will also be completed by November 30, 1993. As with the review discussed above, any discrepancies identified will be properly prioritized and addressed.

Finally, the training and counselling of maintenance staff and procedure writers will be completed by September 1, 1993.