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SUBJECT: Responds to NRC ltr re violations noted in insp rept  
50-261/93-19. Corrective actions: initiated adverse condition  
rept.

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Carolina Power & Light Company  
Robinson Nuclear Plant  
PO Box 790  
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November 3, 1993

Robinson File No.: 13510E

Serial: RNP/93-2733

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
NRC INSPECTION REPORT NO. 50-261/93-19 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 50-261/93-19.

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

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

RDC:lst  
Enclosures  
c: Mr. S. D. Ebnetter  
Mr. W. T. Orders  
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Enclosure

## REPLY TO A NOTICE OF VIOLATION

RII-93-19-01:

Technical Specification 6.5.1.1, Procedures, Tests, and Experiments requires, in part, that written procedures be established, implemented and maintained, covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, 1978, including procedures to facilitate the performance of Technical Specification required surveillances. Implicit in this requirement is that these procedures be followed while performing the applicable evolutions.

Operations Surveillance Test, OST-005, Nuclear Instrumentation Power Range (Bi-Weekly) delineates the test process to be used to satisfy a Technical Specification required surveillance for the power range nuclear instruments.

Contrary to the above, on August 14, 1993, an Operator failed to follow the requisites of OST-005 when he repositioned the Dropped Rod Mode Switch instead of the Operation Selector Switch as specified - an action which resulted in a turbine runback.

REPLY

CP&L acknowledges that the violation occurred as described.

1. The Reason for the Violation

This violation is attributed to personnel error. Prior to performance of Step 7.5.45 of OST-005, the Balance of Plant (BOP) Operator interrupted the test, moving away from the testing location, and requested assistance from the Shift Technical Advisor (STA). Upon resuming the test sequence, the BOP Operator failed to apply adequate focus and self-checking practices, and inadvertently positioned the incorrect switch (Dropped Rod Mode Switch for NI-41 to the "Normal" position instead of the Operator Selector Switch in the "DET B" position) which resulted in the Turbine Runback.

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

Adverse Condition Report 93-145 was initiated to determine the root cause of this event and to formulate corrective actions. Operations personnel have reviewed the event, applying particular attention to the need for increased self verification if a task is interrupted. The BOP Operator involved has received an appropriate level of disciplinary action to reinforce the need for self-checking and verification.

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

The corrective actions stated above are considered adequate for the prevention of further violations.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved by October 30, 1993.

RII-93-19-04:

Technical Specification 6.5.1.1, Procedures, Tests, and Experiments requires, in part, that written procedures be established, implemented and maintained, covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, 1978, including procedures for ensuring the proper calibration of installed plant instrumentation. Implicit in this requirement is that these procedures contain the necessary information to facilitate the proper performance of the applicable evolutions.

Contrary to the above:

- 1) On August 31, 1993, MMM-006 was found to be inadequate, in that TC-6559 A and TC-6559 B (the instruments used to verify compliance with Technical Specification limits on Control Room temperature) were not included.
- 2) On August 30, 1993, MMM-006 was found to be inadequate, in that, DPI-6520 (Control Room Differential Pressure Instrument) was improperly included.

REPLY

CP&L acknowledges that the violation occurred as described.

1. The Reason for the Violation

Both cited incidents are oversights by personnel responsible for the process of determining procedure revisions required by modifications.

Plant Modification M-994, Field Revision 45, initially calibrated temperature controller instruments TC-6559A and TC-6559B but did not include them in MMM-006, Plant Instrument Calibration Program. Exclusion of TC-6559A and TC-6559B from MMM-006 Calibration List was considered an oversight in the design process.

DPI-6520 is a manometer and does not require calibration. Plant Modification M-994, Field Revision 84, shows DPI-6520 as a manometer and explains that it does not need to be calibrated. Therefore, DPI-6520 should not be included in MMM-006. The inclusion of DPI-6520 in the MMM-006 Calibration List was an error in specification by the modification procedure writer. The complexity and length of the modification and the number of lead personnel assigned is a contributing cause to the oversights.

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

Nuclear Engineering Department Adverse Condition Report 93-0113 was initiated to investigate this violation and to formulate corrective action recommendations.

Plant Modification M-994, Field Revision 45, initially calibrated TC-6559A and TC-6559B. These instruments were calibrated on September 1, 1993 and September 2, 1993, and as-found data was within instrument calibration tolerances.

DPI-6520 was removed from MMM-006 on the basis that Plant Modification M-994, Field Revision 84, shows this instrument as a manometer and explains that it does not require calibration.

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

The two cited incidents are considered isolated to the particular modification since the modification procedure review processes would normally catch this type of error. To emphasize the significance of oversights, each RESS designer and engineer will review and understand the cause and results of ACR 93-0113.

4. The Date When Full Compliance Will Be Achieved

Calibration of TC-6559A and TC-6559B and removal of DPI-6520 is complete.

Addition of TC-6559A and TC-6559B to MMM-006 will be completed by November 30, 1993.

RESS designer and engineer reviews of ACR 93-0113 will be completed by December 15, 1993.