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SUBJECT: Responds to NRC ltr re violations noted in insp rept  
 50-261/93-20. corrective actions: developed engineering  
 surveillance test procedure.

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Carolina Power & Light Company  
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Robinson File No.: 13510E  
Serial: RNP/93-2959  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
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NRC INSPECTION REPORT NO. 50-261/93-20 REPLY TO A NOTICE OF VIOLATION

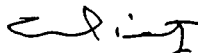
Gentlemen:

Carolina Power and Light Company (CP&L) hereby provides this reply to the Notice of Violation identified in NRC Inspection Report 50-261/93-20.

Enclosure 1 provides a description of the occurrence, the causal factors and root causes identified for the violation, and a discussion of the corrective actions taken and planned for the occurrence.

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

Very truly yours,

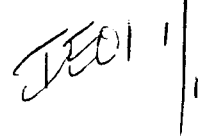
  
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Highway 151 and SC 23 Hartsville SC



## REPLY TO A NOTICE OF VIOLATION

### RII-93-20-01:

10 CFR 50, Appendix B, Criterion V, requires, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions..."

Paragraph 7.0 of Attachment 8.3 to Special Procedure SP-1240, Steam Generator Eddy Current Inspection During RFO 15, requires that, "All eddy current test equipment provided by ABB Combustion Engineering shall be certified... Documentation of calibration will be provided prior to the start of the inspections."

Contrary to the above, on October 1, 1993, Eddy Current Testing was in progress on all three steam generators. Onsite equipment certification/calibration documentation for equipment being used on Steam Generators "A" and "B" had expired and the equipment being used for Steam Generator "C" had not been certified/calibrated.

### REPLY

#### 1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. This violation constitutes a personnel error which is attributed to lack of CP&L oversight of contractor activities.

CP&L Special Procedure SP-1240 was developed to incorporate ABB Combustion Engineering (the NSSS Contractor) procedures for performing eddy current inspections and related activities into one controlling document. The contractor was procedurally specified as responsible for proper equipment set up and collection of the eddy current testing data. The contractor supervisor was also procedurally responsible for providing additional technical support for these activities. While the procedure required that the equipment provided be certified, and documentation of calibration be provided prior to the start of the inspection, the procedure did not provide a sign-off or other method to document that the requirement had been satisfied.

The contractor eddy current operators installing the equipment did not apply sufficient attention to verify the equipment calibration when they were unpacking the equipment. Additionally, contractor supervisory personnel did not verify the equipment calibration status as required by procedure.

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

Upon discovery of this concern, documentation of calibration for inspection equipment for the "A" and "B" Steam Generators was located at the contractor's offsite offices and was immediately transmitted to the site. The inspection equipment installed in "C" Steam Generator was removed from operation and was subsequently determined to be out of calibration. The equipment was replaced with equipment possessing documented current calibration information and the four tubes previously inspected were retested. ABB Quality Assurance personnel conducted an onsite audit of personnel certifications and equipment calibration for all ABB work onsite. All areas were found to be satisfactory.

Adverse Condition Report 93-177 was initiated to document this violation and to recommend corrective actions.

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

In order to preclude recurrence of this violation, an H. B. Robinson Engineering Surveillance Test (EST) procedure will be developed to serve as the governing document for the Steam Generator Eddy Current Program. This procedure will include, as a prerequisite, that the vendor eddy current procedure has been reviewed and signature requirements have been provided to verify that the appropriate prerequisites have been satisfied.

To address the generic implications of this violation, Plant Procedure AP-004, Procedure Control, will be revised to provide appropriate controls to ensure management oversight is applied to special procedures governing onsite vendor activities. Training will be accomplished to ensure personnel are aware of this change.

CP&L recognizes its obligations to provide control over the quality of services provided by contractors. Inherent in this obligation is the responsibility to assure that contractor activities are accomplished in accordance with standards and procedures of a level commensurate with nuclear safety.

4. The Date When Full Compliance Will Be Achieved

The Engineering Surveillance Test procedure will be developed prior to Refueling Outage 16. AP-004 will be revised and training completed on the revision by January 31, 1994.