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SUBJECT: Responds to NRC ltr re violations noted in insp rept
 50-261/93-31. Corrective actions: completed updates & reviewed
 priority A drawing changes.

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Robinson File No.: 13510E
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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NRC INSPECTION REPORT NO. 50-261/93-31 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 50-261/93-31.

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.

Should you have any questions regarding this matter, please contact Mr. W. J. Dorman at (803) 383-1186.

Very truly yours,

Charles R. Dietz
Vice President

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Enclosure
c: Mr. S. D. Ebnetter
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REPLY TO NOTICE OF VIOLATION

Violation RII-93-31-01:

10 CRF 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..."

1. Nuclear Engineering Department NED Guideline Number A-47, Release for Engineering Tasks (RET), requires that the status of a RET be updated weekly.

Contrary to the above, during November 15-19, 1993, seventeen high priority RETs listed on the Outstanding RET Report dated November 17, 1993 had not been updated on a weekly basis.

2. Modification procedure MOD-004, Plant Drawing Preparation, Revision, and Approval, states that Priority A drawings shall be updated within 28 working days.

Contrary to the above, during November 15-19, 1993, thirty three Priority A drawings had not been updated within 28 working days and were classified overdue.

REPLY

CP&L acknowledges the violation.

The failure to update Priority A drawings within the specified time limit of MOD-004 is a direct violation of a quality affecting procedure as defined in 10CFR50 Appendix B. The periodic update of RETs is a NED management expectation imposed to assure items receive proper oversight. NED Guideline A-O states that Guidelines are "supplemental documents that umbrella procedures that provide particular provisions and/or directions considered good practices to comply with procedure requirements but which are not mandatory". Therefore, the failure to update the RETs on a weekly basis is not considered to be a direct violation of procedures as defined in 10CFR50 Appendix B. However, CP&L acknowledges that the untimely review and updating of RETs constitutes a failure of management to properly oversee the processes necessary for proper control of work activities.

1. The Reason for the Violation

Management did not properly monitor and take corrective action to prevent delays in the drawing update process. Although, weekly reports indicated these items were overdue, actions were not taken to properly resolve discrepancies, thus leading to the delays in drawing updates as required by Procedure MOD-004.

NED management failed to adequately monitor the timeliness of RET reviews. The monitoring of RETs was less formal than desired by management standards established in NED Guideline A-47 which resulted in the questionable control of high priority work.

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

The Priority A drawing changes have been reviewed and updates are being completed as appropriate. Because some of the actual physical plant changes have not occurred as scheduled, some of the thirty-three drawings cited in the violation did not require changes, and the requested drawing changes were removed from the drawing change process. Request for changes will be submitted once the physical plant changes occur.

RETs have been reviewed by NED management to assure adequacy of current schedules relative to priority and scope, and the status of each has been documented in accordance with NED Guideline A-47.

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

In order to preclude recurrence of this violation, management will continue to emphasize to engineering personnel the expectations relative to adherence to MOD-004. Additionally, management expectations will be reemphasized relative to the importance of RET guidelines, the basis for these expectations. However, NED Guideline A-47 will not replace the requirement of management to provide proper attention and oversight to the prioritization and timeliness of engineering and design activities.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved by January 31, 1994, with the completion of the Priority A drawing changes.