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 HINNANT, C.S. Carolina Power & Light Co.
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 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violation noted in insp rept 50-261/94-03 re
 use of adequate protective covering to prevent steel shot
 from EDG. Corrective actions: EDG Control Panel vacuum cleaned
 & EDG inspected, Cleaned, vacuumed & Megger tested.

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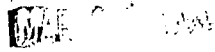
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Robinson File No.: 13510E
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/94-03 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in NRC Inspection Report 50-261/94-03, which was provided in your letter dated February 18, 1994. The cited violations involve failure to employ adequate debris intrusion control measures, and failure to implement the posting requirements of 10CFR19.11. The enclosure provides a restatement of the violations followed by our reply.

Should you have any questions regarding this matter, please contact Mr. R. M. Krich at (803) 383-1802.

Very truly yours,

C. S. Hinnant
Vice President

RDC:ans
Enclosure

c: Mr. S. D. Ebnetter
Mr. W. T. Orders

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PDR ADOCK 05000261
Q PDR

REPLY TO NOTICE OF VIOLATION

Violation RII-94-03-02

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 general procedures for the control of maintenance activities.

Maintenance Management Manual Procedure, MMM-002, Maintenance Administration Program, requires the use of adequate debris intrusion control measures be employed during the performance of maintenance activities.

Contrary to the above, inadequate debris intrusion control measures were employed on November 15, 1993, during paint stripping efforts in the A Emergency Diesel Generator room. As a result, steel shot, which was being used to strip paint, was introduced into the Emergency Diesel Generator as well as its associated generator control and current transformer cubicles.

REPLY

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

1. The Reason for the Violation

This violation was caused by the use of a general work instruction that was not adequately reviewed and did not define the required controls and precautions. This resulted in a lack of instructions to use adequate protective covering to prevent steel shot from being introduced into the Emergency Diesel Generator and associated equipment areas.

A paint stripping machine using steel shot as an abrasive was procured to provide a means of efficiently removing existing floor paint in preparation for repainting. The equipment uses a vacuum system and is designed with a plastic cover to contain the steel shot within the immediate application area. The manual provided with the equipment does not provide any guidance or discussion of the potential for stray shot or shot containment.

The equipment was used for removal of the floor paint in the Reactor Auxiliary Building (RAB) access hallway (outside of the RAB), and in the Charging Pump and the "A" Emergency Diesel Generator (EDG) Rooms inside the RAB. Prior to using the equipment, personnel at other CP&L facilities who were experienced with the equipment were consulted. They advised that approximately 18 inches of plastic equipment cover was adequate to prevent the carry-over of shot which could damage unintended exposed surfaces. A Generic Work Request containing no special instructions or work controls was utilized for the "A" EDG Room work. Because stray steel shot resulted from equipment use in the RAB Hallway, the paint removal work in the Charging Pump and EDG rooms used 2 feet of plastic cover to protect surrounding equipment.

After attempts to remove paint from the floor surfaces, the equipment was found to be ineffective due to the nature of the existing paint, and the effort was abandoned. The Maintenance personnel using the equipment did not recognize that stray steel shot remained in the areas.

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

Upon discovery of the stray steel shot, the "A" EDG Control Panel was vacuum cleaned, and the EDG was inspected, cleaned, vacuumed, and Megger tested. The Charging Pump Room and equipment in the area were also inspected, and approximately 10 stray steel shot were found and removed. Although the paint stripping equipment was used in the RAB access Tunnel, there was no equipment in the area that could have been effected. Therefore no inspection in addition to normal housekeeping activities of that area was performed.

Appropriate personnel at other CP&L nuclear facilities were notified of the potential problem with the use of the paint removal equipment.

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

The use of Generic Work Requests for painting in the Power Block has been discontinued. Similar activities are now accomplished with a specific Work Request with adequate review and appropriate post Maintenance Testing identified by the Work Control Group.

Also, procedures utilized to control painting activities will be revised by May 30, 1994, to ensure that, prior to paint removal, plant equipment in the affected area will be adequately protected.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 30, 1994.

Violation RII-94-03-03:

10 CFR 19.11 (a)(4)(e) requires, in part, that the response to a violation involving radiological working conditions be posted within 2 days of its dispatch to the NRC.

Contrary to the above, on January 5, 1994, the inspectors detected that the licensee's response to violations 50-261/93-26-01 and 93-26-03 which involved radiological working conditions had been dispatched on December 29, 1993, but had not been posted as required.

Reply

CP&L acknowledges the violation.

1. The Reason for the Violation

This violation was caused by lack of an adequately prescribed process that delineates the specific actions to be taken when reviewing incoming and outgoing NRC correspondence. The Regulatory Affairs Section Procedure RP-007, "Commitment Tracking," specifies review of incoming correspondence for 10CFR19 posting requirements; however, it does not adequately address outgoing correspondence. Additionally, since the specific purpose of this procedure is to establish the Commitment Tracking program, its use for prescribing other processes is inappropriate.

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

Upon discovery of this violation, the required documentation was immediately posted.

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

To preclude recurrence of this event, a Regulatory Affairs Section instruction for managing incoming and outgoing NRC correspondence was implemented on March 15, 1994. This instruction specifically identifies the process necessary for identification and required posting of documents applicable to 10CFR19.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 15, 1994.