

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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ACCESSION NBR: 9404140312      DOC. DATE: 94/04/04      NOTARIZED: NO      DOCKET #  
 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C      05000261  
 AUTH. NAME      AUTHOR AFFILIATION  
 HINNANT, C.S.      Carolina Power & Light Co.  
 RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940404 ltr re violations noted in insp rept 50-261/94-01 involving failure to control procedures.

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Carolina Power & Light Company  
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Robinson File No.: 13510E  
Serial: RNP/94-0704

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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. 50-261/94-01 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light (CP&L) Company hereby provides this reply to the Notice of Violation identified in NRC Inspection Report 50-261/94-01, which was provided in your letter dated March 4, 1994. The cited violation involves failure to control procedures. The enclosure to this letter provides a restatement of the violation 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:lst  
Enclosure  
c: Mr. S. D. Ebnetter  
Mr. W. T. Orders

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## REPLY TO NOTICE OF VIOLATION

### Violation RII-94-01-05:

10 CFR 50, Appendix B, Criterion VI, states that measures shall be established to control the issuance of documents such as instructions, procedures, and drawings including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel, and are distributed to and used at the location where the prescribed activity is performed. The Robinson Control and Distribution of the Plant Operations Manual, RMP-005, Rev. 5, states that individuals responsible for the assigned procedure shall incorporate the revision within a reasonable time, destroy all obsolete copies, and return the signed and dated transmittal form "[to Procedure Control]."

Contrary to the above, the licensee failed to maintain some controlled procedures in controlled copy ID #413. On February 2, 1994, five controlled emergency or abnormal procedures in the simulator control booth, controlled copy ID #413, were out of date, and one was missing. These procedures were documented as updated to Procedure Control, but were not changed in the controlled document.

### REPLY

CP&L acknowledges the violation.

#### 1. The Reason for the Violation

This violation was caused by an oversight of the individual responsible to maintain Controlled Copy ID #413 procedures up-to-date.

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

The outdated procedures were removed from Controlled Copy ID #413 and were replaced with the current revision. Appropriate disciplinary actions were taken in regards to the individual who failed to update the controlled copy. A complete audit of procedures assigned to the Simulator was conducted, and no other discrepancies were found. Additionally, in order to fully evaluate the scope of the simulator procedure control problem, a review was performed of the previous concern that was referenced in the Inspection Report. Our investigation had determined that the causes of these problems are not related. The earlier incident occurred because, after removal of the outdated procedure, its unique format (i.e., oversized status board) did not lend itself to easy disposal. The current revision had in fact been placed in its proper location; however, the earlier revision was still physically located in the immediate vicinity. Therefore, we believe the corrective actions for the previous concern would not have prevented the procedural control violation which we are acknowledging.

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

As a result of the specific concerns identified with Controlled Copy ID #413, an audit of controlled documents was initiated. This audit, coupled with concerns raised during a subsequent NRC inspection, identified a generic concern with control of documents throughout the plant.

The following additional actions will be taken to avoid recurrence of this violation and to correct the causes for the generic concern that was identified.

- The number of site locations maintaining copies of controlled procedures and drawings will be reduced. An audit of the remaining controlled copies of procedures and drawings will be conducted to ensure only current copies of these documents are available for use.
- Expectations regarding maintenance and use of controlled documents will be developed and enforced. These expectations will be delineated to document users and individuals assigned responsibility for maintaining control of documents.

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- A self-assessment procedure to monitor maintenance of controlled documents will be developed and will require periodic audits of controlled documents. This procedure will include methods to maintain management oversight.
- Document Control personnel will assume responsibility for conducting document updates for those libraries under their direct control to ensure accuracy and to provide consistent process oversight.

4. The Date When Full Compliance Will Be Achieved

Full compliance for this violation will be achieved by May 30, 1994.