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SUBJECT: Responds to NRC 940314 ltr re violations noted in insp rept
 50-261/93-35. Corrective actions: addition of scales to
 automatic voltage adjustment knobs for each EDG to allow
 position of knobs to be determined.

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Robinson File No.: 13510E
Serial: RNP/94-0735

APR 13 1994

Director, Office of Enforcement
United States Nuclear Regulatory Commission
Attn: Document Control Desk
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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. 50-261/93-35 REPLY TO A NOTICE OF VIOLATION**

Gentlemen:

This provides the Carolina Power & Light Company reply to the Notice of Violation identified in NRC Inspection Report 50-261/93-35, which was transmitted by letter dated March 14, 1994. The Notice of Violation and Proposed Imposition of Civil Penalty involve the failure to provide control over activities affecting quality resulting in simultaneous degradation of both Emergency Diesel Generators (EDGs) and the failure to correct conditions adverse to quality affecting the operability of the "B" EDG.

As requested in the letter transmitting the Notice of Violation and Proposed Imposition of Civil Penalty, the enclosure restates each violation, followed by our reply. Also enclosed is our check in the amount of \$37,500 for payment of the Civil Penalty.

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

130002

RDC:lst
Enclosures

c: Mr. S. D. Ebnetter, Administrator, US NRC, Region II
Mr. W. T. Orders, Senior Resident Inspector, HBRSEP

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REPLY TO A NOTICE OF VIOLATION

Violation A:

10CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," requires, in part, that the quality assurance program shall provide control over activities affecting the quality of systems and components, to an extent consistent with their importance to safety.

Contrary to the above, as of November 22, 1993, the licensee's quality assurance program did not provide controls over activities affecting the quality of systems and components, to an extent consistent with their importance to safety. Specifically, the licensee failed to assure control of the position of the automatic voltage regulator adjustment potentiometers for the "A" and "B" emergency diesel generators (EDGs). This resulted in simultaneous degradation of both EDGs when the unit was at power operation between November 12 and November 17, 1993 due to misadjustment of the "A" EDG and "B" EDG voltage regulators to 440 volts and 450 volts, respectively, as opposed to the required 480 volts. The degradation of the "A" and "B" EDGs was discovered on November 22 and November 25, 1993, respectively.

1. Denial or Admission

Carolina Power & Light (CP&L) agrees that the violation occurred as described.

2. The Reasons for the Violation

As stated in Licensee Event Report 93-19, the root cause of the misadjusted Automatic Voltage Adjustment Knob is attributed to the lack of adequate controls being applied during painting of the Generator Control Panel. Painting had historically been conducted under a "generic" Work Request with no special precautions or instructions applied to the specific application. Both EDG Generator Control Panels on which these knobs are located were painted on the morning of November 11, 1993, as a part of generic building painting upgrade.

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

Corrective actions for the incorrect setting included the addition of scales to the Automatic Voltage Adjustment Knobs for each EDG to allow the position of the knobs to be determined. The settings are now being checked each shift to verify their position as being correct and will continue to be verified until such time that this action is no longer considered necessary. Additionally, other equipment with no automatic indication of equipment mis-alignment has been added to Operator logs for routine checks. This routine check will also be continued until such time that this action is no longer considered necessary.

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

Protective clear plastic covers have been placed over the knobs to prevent inadvertent operation. The use of "generic" Work Requests for painting in the Power Block has been discontinued.

5. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the above corrective actions.

Violation B:

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," states, in part that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, as of November 22, 1993, established measures did not assure that conditions adverse to quality were promptly identified and corrected. Specifically, the investigation and corrective actions for failure of the "B" EDG during surveillance testing on October 25, 1993 were inadequate, resulting in the failure of the "B" EDG to start on November 22, 1993.

1. Denial or Admission

CP&L agrees that the violation occurred as described.

2. The Reason for the Violation

This violation was the result of an inadequate root cause analysis. Initial efforts in determining the root causes of the first start failure of the "B" Emergency Diesel Generator (EDG) were narrowly focused on the symptom instead of underlying causes. Additionally, the complexity of Air Start Distributor failure mechanisms contributed to the inadequacy of the initial root cause determination. As a result, the initial corrective action was not thorough enough to preclude the second start failure.

The root cause analysis process tends to be focused on human performance. While this process will identify equipment as a causal factor, it does not provide the tools to learn the basis for equipment failure. Also, previous training in other equipment troubleshooting techniques has not been effectively utilized, and the knowledge gained from this training has diminished in many cases. A self-assessment of previous root cause evaluations has revealed that only the effects of the problem are typically identified versus the cause of the problem.

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

The Air Start Distributor on the "A" and "B" EDGs have been replaced. Since replacement of the Air Start Distributors, no failures to start have been attributed to the Air Start System on either EDG. Analysis of the distributor removed from the "A" EDG indicated there was much less wear and damage than was present on the "B" EDG air start distributor. The refueling surveillance test procedure was also revised to assure that the air start solenoids do not remain de-energized after the EDG has started.

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

Corrective actions for this violation are being addressed by the initiatives in the Plant Near Term Improvement Plan. The specific solution will be the enhancement of the questioning attitude by problem evaluators. Root cause evaluations by plant staff members will be critically reviewed and returned to the evaluator if found not to be adequate. Also, selected future root cause evaluations will be conducted by personnel assigned to investigation teams. An overview of completed evaluations will be performed by management on a continuing basis in order to assess the development of the questioning attitude philosophy. The resultant management evaluation will be provided as feedback to the investigation teams on the quality of their product. These actions will be initiated during April, 1994, and will be ongoing.

During the enforcement conference concerning this matter held on January 10, 1994, we committed to the performing of a comprehensive review of EDG preventative maintenance scope and frequency. To accomplish this commitment, an EDG Improvement Team has been established to upgrade system performance and reliability. This team will also evaluate and recommend improvements for better matching turbocharger and blower performance which were identified during the investigation of the air damper failure on February 18, 1994. The improved preventative maintenance program and resolution of the turbocharger issues will be completed prior to startup from the next refueling outage.

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5. The Date When Full Compliance Will Be Achieved

Based on the corrective actions described above, full compliance will be achieved as these actions are implemented. The current schedule is for complete implementation of the Near Term Improvement Plan actions by June 30, 1994.