

September 20, 1995

Carolina Power & Light Company
ATTN: Mr. C. S. Hinnant
Vice President
H. B. Robinson Steam Electric Plant
Unit 2
3581 West Entrance Road
Hartsville, SC 29550

SUBJECT: NRC INSPECTION REPORT NO. 50-261/95-14

Dear Mr. Hinnant:

Thank you for your response of July 12, 1995, to the Notice of Violation issued on June 12, 1995, concerning activities conducted at your Robinson facility. We have examined your response and found that it meets the requirements of 10 CFR 2.201.

In your response, you denied that a violation of NRC requirements occurred with regard to Violation A which concerns three examples of inadequate measures established to ensure the quality of purchased services. You agree that Violation B occurred as described.

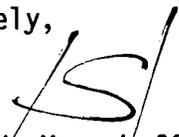
After careful consideration of the bases for your denial of the violation, we have concluded, for reasons presented in the enclosure to this letter, that Violation A occurred as described. Therefore, in accordance with 10 CFR 2.201(a), please submit to this office within 30 days of the date of this letter a written statement describing steps which have been taken to correct Violation A and the results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

We will examine the implementation of your actions to correct Violation B during future inspections.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

We appreciate your cooperation in this matter.

Sincerely,



Ellis W. Merschhoff, Director
Division of Reactor Projects

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Docket No.: 50-261
License No.: DPR-23

Enclosure: (See page 2)

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Enclosure: Evaluations and Conclusion

cc w/encl:

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EVALUATIONS AND CONCLUSION

On June 12, 1995, a Notice of Violation (Notice) was issued for a violation identified during a routine NRC inspection. Carolina Power & Light Company (CP&L) responded to the Notice on July 12, 1995. CP&L denied that a violation of NRC requirements occurred with regard to Violation A. The NRC's evaluations and conclusion regarding the licensee's argument are as follows:

Restatement of Violation A

10 CFR 50, Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, requires in part, that measures be established to ensure the quality of purchased services. Implicit in this requirement are the requisites that contracted service personnel who perform activities affecting quality, be indoctrinated and trained as necessary to assure that they achieve and maintain a suitable proficiency, and that they accomplish activities affecting quality in accordance with instructions, procedures or drawings of a type appropriate to the circumstances.

Contrary to the above, the measures established by the licensee to ensure the quality of purchased services were inadequate in that:

- 1) On May 8, 1995, a contracted refueling technician failed to follow procedure FHP-001, Fuel Handling Tools Operating Procedure, regarding the orientation of a thimble plug tool he was using. Ultimately, this resulted in his failure to successfully perform nineteen steps of procedure FMP-19, Fuel And Insert Shuffle.
- 2) On May 3, 1995, a contracted refueling technician did not verify polar crane/refueling manipulator crane clearance after he relocated the latter; the contracted polar crane operator had not been trained on Maintenance Instruction MI-510, Polar Crane General Instructions; the contracted polar crane operator had not received a cogent proficiency verification on the polar crane's operation; and the polar crane operator did not verify the position of the refueling manipulator crane before moving the polar crane. Ultimately, this resulted in the polar crane colliding with the refueling manipulator crane, causing significant structural damage to the latter.
- 3) On May 4, 1995, the contracted polar crane operator moved the polar crane on his own initiative, with no communication or direction from the signalman, from a position in which he could not see the auxiliary hook. This resulted in the auxiliary hook striking the concrete cubicle surrounding the top of the "C" steam generator.

This is a Severity Level IV violation (supplement I).

Summary of Licensee's Response

The licensee's response details the commitments made by CP&L to meet the requirements of 10 CFR 50, Appendix B, Criterion VII, to ensure the quality of purchased services. The licensee states that the training requirements for the contractors were specified in the appropriate contracts and were carried out. The licensee argues that the commitments were met by the "implementation of the purchase contract requiring that contractors meet the provisions of the CP&L QA Program, and by the conduct of training specified in the procurement documents" and therefore, denied the violation.

In reply to the first example of the Violation A, which involved a contracted refueling technician who failed to follow a fuel handling procedure, the licensee states that during the performance of procedure FMP-019, Fuel And Insert Shuffle, the contractor failed to successfully perform nineteen steps of the procedure when he failed to review procedure FHP-001, Fuel Handling Tools Operating Procedure. The licensee states that FHP-001 was a procedure that was required to be reviewed under the provisions of their contract. In addition, the licensee states that the cause of the event was inattention to detail by the contract supervisor who failed to review the general precaution in procedure FHP-001 and a failure by personnel performing procedure FMP-019 to verify thimble plug movement during each step of the movement of the plugs.

In reply to the second example of the Violation A, which involved a contracted technician who was neither adequately trained on, nor verified to be proficient in, the operation of the reactor building polar crane, the licensee concluded that the event was caused by an inadequate design of interlocks for the polar crane system that affords no protection for certain configurations of the polar and manipulator cranes. However, the licensee states that the contract training requirements did not include training on MI-510, Polar Crane General Instructions.

In the third example of the Violation A, the same polar crane operator initiated a polar crane move of his own initiative, without being able to see the auxiliary hook, and did not use a signalman.

NRC Evaluation

The licensee's response argues that the measures put in place to ensure the quality of contractor services were adequate; yet, the response admits to deficiencies in providing and implementing these measures.

In example 1 of Violation A, the contract supervisor failed to review the general precautions of a required procedure and failed to implement procedures. The licensee does not provide information on training of contractors in CP&L's expectations on procedure compliance and supervision of work. In this case, although we agree that the fact that procedure FMP-019 did not reference FHP-001 or contain information about

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thimble orientation is a weakness; we conclude that deficiencies existed in the training and knowledge of the contract supervisor in that the provisions of the contract were not met for review of a required procedure and no argument is presented that CP&L is ensuring appropriate training on procedural compliance and work supervision.

The NRC does agree with your assessment of the second example of the violation. Although an interlock system could be an effective deterrent to inappropriate movement of the polar crane, it should not be relied upon as a substitute for procedure implementation and adequate training/indoctrination. In this specific case, had the contract required training of the polar crane operator on procedure MI-510, Polar Crane General Instructions, which specifically requires that the polar crane operator verify the position of the manipulator crane before moving the polar crane, the event may have been prevented.

The third example of violation A, where the same polar crane operator initiated a polar crane move of his own initiative, is also indicative of inadequate training/indoctrination, the lack of adequate procedures or the failure to use them, and lack of supervision. This example occurred one day after example 2 discussed above, further indicating the deficiencies in the contract employee's training. Even though the event described in example 2 resulted in significant damage to the refueling manipulator crane, the licensee does not indicate that immediate action was taken to confirm the contract crane operator was adequately trained for the work prior to performing additional crane manipulations.

Ultimately, the three examples were caused by a lack of adequate contractor supervision and inadequate training. Both of these are critical elements in a contractor control program.

NRC Conclusion

Accordingly, the NRC concludes that the violation occurred as stated.

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