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RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC ltr re violations noted in insp rept
50-261/93-14.Corrective actions:secured vital area door &
searched area to confirm unauthorized access had not
occurred.

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Carolina Power & Light Company

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AUG 13 1993

Robinson File No.: 13510E

Serial: RNP/93-1938

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. 50-261/93-14 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 50-261/93-14.

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. Enclosure 2 provides additional information concerning the H. B. Robinson Security Program as requested by the Inspection Report.

Should you have any questions regarding this matter, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,

Charles R. Dietz
Vice President
Robinson Nuclear Plant

RDC:lst

cc: Mr. S. D. Ebnetter
Mr. W. T. Orders
INPO

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REPLY TO NOTICE OF VIOLATION 93-14-01

CP&L acknowledges that the violation occurred as described, and recognizes its significance in that this is a repeat event. For this particular event, while the Vital Area Door was in access and unattended for a period of three minutes, it was locked, and upon discovery, was immediately secured and verified that no unauthorized access had occurred.

1. The Reason for the Violation

The cause of this event is attributed to failure to follow the Lessons Learned Memorandum dated June 3, 1992, which had been established as corrective action addressing a previous similar event. Additionally, verbal communications were not fully understood by the personnel involved, and self-checking practices were not adequately applied to ensure the intended actions to be taken were correct. The self checking practice was described in the Lessons Learned Memorandum mentioned above. Causal factors contributing to this violation included an exceptional level of activities in the Central Alarm Station (CAS) and the Access Control Station (ACS) during the time the door was being accessed, and poor radio communications.

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

The immediate corrective actions were to secure the Vital Area Door and search the area to confirm unauthorized access had not occurred.

Disciplinary action was initiated for those Security personnel involved.

Procedure SP-009, Locks and Key Procedures, has been revised, removing the requirement to place the door in access (defeat the alarm) prior to opening for admittance of personnel. This change eliminates the possibility of leaving a door unattended with the alarm defeated following an authorized entry. This procedure change was effective on May 12, 1993.

Security personnel were trained in the techniques of self-checking to ensure that intended actions are understood prior to being performed. In addition, training was also conducted to re-emphasize the importance of adherence to established procedures and the Lessons Learned Memorandums previously issued for this event. Training was completed on July 29, 1993.

In order to address the communication equipment concern, the condition of the Security radios was evaluated during May, 1993. Defective equipment has been replaced as necessary.

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

The above corrective actions are sufficient to preclude recurrence of this event.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved with the above actions on July 29, 1993.

ADDITIONAL INFORMATION

The following items are addressed as requested in the cover letter transmitting the Inspection Report:

In 1992, CP&L recognized a need to apply more attention to the maintenance of the H. B. Robinson Security System. Funding was allocated, and in January, 1993, two contract technicians were brought in and assigned to provide full time maintenance support for the Security System. Since that time, significant progress has been made. The Security Work Request backlog has decreased, and the frequency of loggable failed equipment from the second half of 1992 to the first half of 1993 has been reduced by more than fifty (50) percent. While significant progress has been made, CP&L recognizes that further improvements in the maintenance of the Security System are still needed. CP&L will continue to reduce Work Request backlog, maintain the existing system in good working order, establish a comprehensive preventative maintenance program, and establish a tracking and tending program with support of the System Engineer and System Team Approach. System Engineering concepts will be applied. The System Engineer and members of the System Team have been designated and the team has been meeting since July 6, 1993. The team, which is comprised of members from Technical Support (System Engineer), Maintenance, Computer Support, Facilities Management, and Security, currently meets once a week.

As part of the inspection report, CP&L was requested to address four (4) specific questions related to the pursuit of improved maintenance. These questions are addressed as follows:

CCTV ASSESSMENT

One of the first tasks addressed by the contract I&C technicians was to improve the effectiveness of the CCTV System. Adjustments have been made to the CCTV Monitors in the CAS and the SAS, and cameras have been replaced as necessary. For the interim, CP&L intends to move the strands of barbed wire to the inside of the Protected Area perimeter barrier, and provide river stone along the zone of detection (where needed) for better camera contrast. Future plans include installation of the Video Capture System and replacement of the existing CCTV System with a new solid state system. Moving the barbed wire and providing the river stone is scheduled to be completed by December 31, 1993. Installation of the Video Capture and the new solid state CCTV System is scheduled to be completed during 1994. As part of the installation of the new solid state cameras, the cameras will cover the zone of detection. Once the work is complete, a revision to the Security Plan will be submitted to reflect these changes.

REPETITIVE ALARM RESOLUTION

The frequency of failed alarms has been reduced, largely due to the work performed by the contract I&C technicians. Based on review of failure information, the major source of alarms was the microwave system. New circuit boards have been installed, and have apparently resolved problems with one type of microwave unit. Additionally, one of the most troubling microwave zone points (ALMXZ8) has been repaired. E-Field alarms were addressed during the initial System Team meeting, and the immediate corrective action initiated was for the removal of vegetation and other debris and leveling the uneven terrain. Upon completion of these actions, further trending of the alarms will be conducted by utilizing the Repetitive Failure Program. CP&L considers that repetitive alarm concerns have been significantly reduced and will continue to resolve repetitive alarm problems as part of the review by the System Team process.

PREVENTATIVE MAINTENANCE PROGRAM

The System Engineer is currently conducting an assessment of the existing Preventative Maintenance (PM) procedures. This assessment has been initiated and is scheduled to continue through the fall refueling outage and is scheduled to be completed by March 31, 1994. This effort will initially focus on repetitive failures with the primary objective to identify necessary program improvements. As such, any new procedures considered necessary to improve the Preventative Maintenance Program will be developed.

TRACKING AND TENDING PROGRAM

CP&L recognizes the need to develop and implement a meaningful tracking and tending program for Security System failures. Currently, the Repetitive Failure Program tracks failures of components utilizing component work history. Through the System Team meetings, I&C Technicians have been instructed to detail all methodologies used to make repairs on Security equipment. As such, detailed cause and corrective action information will enhance the review of repetitive failure reports. Refinements in the Repetitive Failure Program to meet the continuing System Engineer and System Team needs are being pursued.

In addition to the above, a member of the Security Unit will visit another utility which had developed an effective program for tracking and trending equipment failures. The results of this trip will be shared with plant management and the System Team for consideration.