

CP&L

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

August 20, 1982

Robinson File No: 13510E

Serial: RSEP/82-1356

Mr. James P. O' Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 82-20

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

A. SEVERITY LEVEL #IV VIOLATION - IER-82-02-02-SL4

Technical Specification 6.8.1 requires that written procedures shall be implemented. The control of drawings required by 10CFR50 Appendix B, Criterion VI, is implemented by Section 6 of the Corporate Quality Assurance Program which requires that superseded drawings be controlled to prevent inadvertent use, that accurate drawings are available in the field, and that a master list of current drawings be updated and distributed to preclude use of superseded documents. The H. B. Robinson drawing control program is implemented by Volume 1 Section 9, Volume 20 Procedure ENG-4, and Volume 21 Procedure DC-1 of the Plant Operating Manual which require that measures be established and implemented to control the issuance of drawings and drawing revisions and assure that these drawings and revisions are accurate, properly distributed, and used at the location where prescribed activities are performed.

Contrary to the above, as of May 14, 1982, drawing control procedures were not implemented resulting in the failure to maintain complete and current controlled drawings for use in the plant, failure to notify all holders of controlled drawings of revisions, failure to distribute new or revised controlled drawings reflecting modifications to or installation of operable systems important to safety, and failure to control all drawings located and used in the plant. This violation was previously cited in Appendix A of Inspection Report 50-261/81-12 dated May 11, 1981.

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1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

H. B. Robinson (HBR) Plant personnel have been actively engaged in a major drawing update program for the last two years. This program has resulted in the redrawing of all flow drawings (P&ID), logic drawings, Hagan drawings, and control wiring diagrams (CWDs). This massive quantity of work, however, did not have adequate quality control hence the above violation. One major reason for the quality control being less than adequate was the lack of a consistent drafting standard against which all drawings could be judged. Also, there were some deficiencies in the overall drawing control program. While the program did contain most of the elements necessary for a successful drawing control program it lacked the critical element of "feedback". This lack of feedback was very crucial given the fact that the program was divided between two groups at the plant, Engineering and Administration. By not having an adequate feedback mechanism, plant management was not alerted to problems and, therefore, was not able to correct the deficiencies.

3. The Corrective Steps Which Have Been Taken and Results Achieved

A new drawing update program has been developed and is currently underway. The first phase of this program is based on generating as-built flow diagrams for the safety-related portions of systems which have been identified as important to safety: Service Water, Containment Spray, Auxiliary Feedwater, Reactor Coolant, Component Cooling Water, Safety Injection, Residual Heat Removal, Diesel Generators, and Containment Air Handling. The first step in generating the above as-built flow diagrams was the development of a drafting standard. This standard, which defines the level of detail to be included on flow diagrams and the various drawing symbols to be used, was developed with detailed input from Drafting, Operations, and Plant Management personnel, and an outside consultant who was brought in to direct the first phase of the drawing update program. This drawing standard was then used by two independent teams, each consisting of one SRO, one RO, and one I&C Technician, to walk down the previously identified systems. These walkdowns were completed on June 30, 1982, with the submittal of Drawing Change Requests.

In addition to the as-built system walkdowns, changes were made to the overall drawing control program. These changes are specifically designed to provide improved quality control and feedback/identification of problems for correction.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

Although the above noted actions should be sufficient to preclude further violation, additional improvements in both organization and organizational control are being considered. These changes will provide a single point of responsibility for all drawing control program procedures and will make supervision of the program much easier.

In addition to the organizational changes being considered, the second phase of the drawing update program is also underway. This phase includes the incorporation of all drawing changes identified in the first phase into the permanent plant drawings, and the "as-built" walkdown of the remaining plant systems. CP&L plans to augment the drawing control staff during the second phase of the update program so that the work can be completed as fast as possible and still maintain adequate quality control.

5. Date When Full Compliance Will Be Achieved

Compliance has been achieved as noted above, and the second phase of the drawing update program will be completed by September 1, 1983.

B. SEVERITY LEVEL IV VIOLATION - IER-82-20-03-SL4

Technical Specification 6.8.1 requires that written procedures shall be established and maintained that meet or exceed the requirements and recommendations of Section 5.2 and 5.3 of ANSI N18.7-1976 and Appendix A of USNRC Regulatory Guide 1.33 Rev. 2.

Contrary to the above, as of May 14, 1982, the requirement to maintain and use accurate operating procedures was not fully implemented in that operating procedure valve checkoff lists for the reactor coolant system, safety injection, containment spray system, waste disposal system, service water system, and chemical and volume control system did not include all valves, handled instrument valves inconsistently, gave incorrect valve descriptions, and gave incorrect valve numbers, and some procedures did not return the system to normal after an evolution.

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for the Violation

The procedures cited in the Inspection Report have been used in the safe operation of the Plant for many years. However, over the years some changes have been made to the plant systems that were not accurately described in the drawings or operating procedures. In general, these discrepancies involved root isolation valves, instrument valves, drain valves, vent valves, and the exact position of branch lines. There are two main causes for these discrepancies. First, due to the lack of a drafting standard the flow diagrams were not consistent with respect to root isolation valves, instrument valves, drain valves, and vent valves and, therefore, it was difficult for the persons preparing procedures and drawings to determine which valves should be in the operating procedure. Second, at times there was a failure on the part of the operations staff to implement procedure changes when the procedures were thought to contain "minor" discrepancies.

3. Corrective Steps Taken and Results Achieved

All plant personnel and in particular Operations personnel have attended training sessions given by plant management which have stressed procedural compliance. The major objective of this training was to make it clear that procedure compliance is mandatory and that any procedure which is inaccurate is not to be used until it is changed or revised as appropriate.

The operating procedure discrepancies identified in the Inspection Report have been corrected. All operating procedure valve lineups corresponding to the systems which were walked down for the first phase of the drawing update program have also been reviewed and revised as necessary.

4. Corrective Steps That Will Be Taken To Avoid Further Violation

The additional training on procedural adherence and continuing management review in this area should reduce the probability of this type of violation. In addition, the operating procedure valve lineups corresponding to the second phase of the drawing update program will be reviewed and revised as the drawings are updated.

It should be noted that prior to this inspection the plant had identified the need for a general upgrading of the plant operating procedures. As a result of recent reviews this general upgrading has been expanded to include the development of a procedure preparation standard for use during the review/revision of all plant operating procedures and test procedures.

5. Date When Full Compliance Will Be Achieved

The operating procedure valve lineups which will be review/revise in connection with second phase of the drawing update program will be complete by September 1, 1983. The overall upgrading of all plant operating procedures and test procedures is tentatively scheduled for completion by the end of 1983.

C. SEVERITY LEVEL IV VIOLATION - IER-82-20-13-SL4

Technical Specification 6.8.1 requires written procedures to be implemented that meet the requirements of Appendix A Regulatory Guide 1.33 dated February, 1978.

Contrary to the above, procedures for the control of radioactivity were not followed in that:

1. HP-11, "Survey Instrument Calibration", Revision 11, Step 3.1.1 states each beta-gamma survey instrument shall be calibrated every 90 days \pm 23 days. On May 19, 1982 a frisker (number 14092) was being used in the hot machine shop with a calibration due date of April 9, 1982.
2. HP-28, "Control of Personnel Contamination and Decontamination Techniques", Revision 2, Step 3.1.2 states when exiting a monitoring station all personnel are responsible for frisking. Step 3.1.3 requires the instrument to have an alarm setpoint 100 cpm above background. On May 17, 1982, two individuals exiting the protected area used instruments which were turned off.

(1) Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the above violation.

(2) Reason for the Alleged Violation

In the first observation, the inspector identified a frisker in the hot machine shop which was overdue for calibration. Review of procedures HP-1.1, "Radiation Control Area Surveillance Program", and HP-11, "Survey Instrument Calibration", has revealed procedural deficiencies which could be responsible for the incident. This incident is also attributable to personnel oversight since the calibration due date was overlooked during the daily frisker alarm setpoint check required by HP-1.1.

In the second observation, the inspector witnessed two individuals at the exit of the protected area frisking with instruments which were turned off. This incident may also be attributed to personnel oversight for the following reasons:

- a) Survey instruments which are turned off, unplugged, or inoperable for any reason and, therefore, cannot meet the response criterion in HP-11 are required to be tagged "Out of Service". This was not done in this case.
- b) The individuals who were frisking did not recognize that the instruments were not operating.

(3) Corrective Steps Which Have Been Taken and Results Achieved

Frisker No. 14092 was removed from service and replaced with a calibrated frisker. The "Survey Instrument Inventory Log" in the "Survey Instrument Calibration" procedure was reviewed for instruments out of calibration. All survey instruments that were in service were checked for the expiration date. All "active" survey instruments were currently within the calibration date.

The friskers located at the exit of the protected area were removed from service and replaced with operating friskers.

(4) Corrective Steps Which Have Been Taken to Avoid Further Violation

The Radiation Control Subunit is currently reviewing the aforementioned procedures for deficiencies in survey instrument inventory and calibration control. In addition, the Radiation Control Group will conduct technician training on survey instrument inventory, and calibration control. The need for strict procedural compliance has been provided to the entire plant staff in a recent training session by plant management. Continued emphasis on procedural compliance by plant management and Radiation Control supervision should reduce the probability of this event recurring. The General Employee Training (GET) Program has also been revised to include student participation in the method of "frisking" for contamination.

(5) Date When Full Compliance Will Be Achieved

All corrective actions will be completed by October 30, 1982.

D. SEVERITY LEVEL IV VIOLATION - IER-82-20-09-SL4

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements of Section 5.2 of ANSI N18.7-1976. The requirements of Section 5.2.14 of ANSI N18.7-1976 and 10CFR50 Appendix E, Criterion XIII, concerning measures to control storage and preservation of quality controlled material and equipment, are implemented by Section 5.3 of the Corporate Quality Assurance Program (CQAP). The CQAP requires that such material and equipment held in storage be controlled to prevent deterioration and incorporates the requirements of ANSI N45.2.2-1972, Section 6.4.2. Additionally, stock items must be monitored to assure that perishable items are removed and controlled for proper disposition at the end of their shelf-life.

Contrary to the above, as of May 21, 1982, quality controlled material and equipment storage procedures were not established or implemented in that:

1. Preventive maintenance procedures for proper maintenance during storage had not been established or implemented for the insulation resistance testing and for the rotation of the shafts of Q-list electrical motors in storage.
2. Shelf-life procedures of Storeroom Procedure SR-3 did not control Q-list shelf-life items, such as valve diaphragms and chemicals, which had been received either before the procedure was implemented or received without required shelf-life specifications.

(1) Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

(2) Reason for the Violation

- a) This deficiency was identified during the July, 1981 Performance Appraisal Inspection. However, adequate attention was not placed on developing the procedures for insulation resistance testing and for rotation of the shafts of electrical motors in storage in a timely manner.
- b) The shelf-life program SR-3 as originally implemented did not include retrofitting the equipment received prior to the implementation of the program. As indicated in the violation, this implementation of SR-3 was not adequate.

(3) Corrective Steps Which Have Been Taken and Results Achieved

- a) Q-list electrical motors were insulation resistance tested, and the shafts requiring rotation were rotated in June, 1982. Procedure PM-11 was implemented on July 26, 1982 to ensure these motors are checked every six months hence.
- b) Material for which shelf-life is a consideration is now being covered by SR-3 or a "hold tag" has been placed on the material. Purchase Requisitions are being issued to replace material and/or parts which are in stock without the required shelf-life documentation (i.e., on hold). In the interim, an Engineering Evaluation will be required prior to issuing any part which carries a "hold tag". The Engineering Evaluation will determine if the material is acceptable for use.

(4) Corrective Steps Which Will Be Taken to Avoid Further Violation

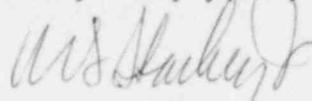
The corrective steps taken are considered adequate to be in full compliance.

(5) Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

If you have any questions concerning the above information, please contact me.

Very truly yours,



R. B. Starkey, Jr.
General Manager

H. B. Robinson SEG Plant

CW/bs

cc: R. C. DeYoung