

# UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET SW SUITE 23T85 ATLANTA, GEORGIA 30303-8931

July 11, 2003

Carolina Power & Light Company ATTN: Mr. John W. Moyer Vice President H. B. Robinson Steam Electric Plant Unit 2 3851 West Entrance Road Hartsville, SC 29550

# SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT- NRC INTEGRATED INSPECTION REPORT 50-261/03-04

Dear Mr. Moyer:

On June 14, 2003, the Nuclear Regulatory Commission (NRC) completed an inspection at your Robinson facility. The enclosed integrated inspection report documents the inspection findings, which were discussed on June 25 with Mr. Tim Cleary and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, the inspectors identified two issues of very low safety significance (Green). These issues were also determined to involve violations of NRC requirements. However, because of the very low safety significance and because they have been entered into your corrective action program, the NRC is treating these issues as non-cited violations in accordance with Section VI.A.1 of the NRC's Enforcement Policy. If you contest the non-cited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Robinson facility.

CP & L

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Sincerely,

/RA/

Paul E. Fredrickson, Chief Reactor Projects Branch 4 Division of Reactor Projects

Docket Nos.: 50-261 License Nos.: DPR-23

Enclosure: Inspection Report 50-261/03-04 w/Attachment: Supplemental Information

cc w/encl: (See page 3)

### CP & L

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# U. S. NUCLEAR REGULATORY COMMISSION

# **REGION II**

Docket Nos:	50-261
License Nos:	DRP-23
Report No:	50-261/03-04
Licensee:	Carolina Power & Light (CP&L)
Facility:	H. B. Robinson Steam Electric Plant, Unit 2
Location:	3581 West Entrance Road Hartsville, SC 29550
Dates:	March 23 - June 14, 2003
Inspectors:	B. Desai, Senior Resident Inspector D. Jones, Resident Inspector
Approved by:	Paul E. Fredrickson, Chief Reactor Projects Branch 4 Division of Reactor Projects

# SUMMARY OF FINDINGS

IR 05000261/2003-004; Carolina Power & Light; 03/23/2003-06/14/2003; H. B. Robinson Steam Electric Plant, Unit 2; Equipment Alignment, Personnel Performance During Non-Routine Evaluations.

The report covered a three month period of inspection by resident inspectors. Two Green noncited violations (NCVs) were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

## A. Inspector Identified and Self - Revealing Findings

Cornerstone: Mitigating Systems

• <u>Green.</u> A failure to adequately implement an operating procedure resulted in the mispositioning of a vent valve in the safety injection (SI) system.

A non-cited violation of Technical Specification 5.4.1 was identified. This finding is greater than minor and had credible impact on safety. The finding had the potential for affecting the mitigating systems cornerstone equipment, including, loss of reactor water storage tank level, flooding of the SI pump room and subsequent loss of SI and containment spray pumps due to flooding. The finding is of very low safety significance (Green) because any significant leakage would have caused the auxiliary building sump level to increase, alerting the control room. Further, the pipe cap downstream of the mispositioned valve had not exhibited any leakage. (Section 1R4)

• <u>Green.</u> A failure to follow an abnormal operating procedure resulted in an improper increase in turbine load for the purpose of temperature control.

A non-cited violation of Technical Specification (TS) 5.4.1 was identified for failure to follow Abnormal Operating Procedure (AOP)-15, Secondary Load Rejection. The procedure requires, under specific conditions, the operators to either insert control rods or borate the reactor coolant system for the purposes of temperature control. However, subsequent to receipt of a turbine runback, increasing turbine load was used for temperature control. This finding affected mitigating systems cornerstone equipment. The finding had a credible impact on safety and is greater than minor because the turbine load action was nonconservative. The finding was determined to be of very low safety significance (Green) because TS limits were not exceeded and the power increase from the turbine load increase following the runbacks was very small and did not approach reactor protection system setpoints. (Section 1R14)

B. <u>Licensee Identified Violations</u>

None

# REPORT DETAILS

## Summary of Plant Status

Robinson Unit 2 operated at or near 100 percent power for almost the entire report period. Two turbine runbacks on April 5 caused power reduction to approximately 95 percent. On May 16 and 17, power was reduced to approximately 55 percent to conduct scheduled turbine valve testing.

## 1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

## 1R04 Equipment Alignment

a. Inspection Scope

<u>Complete System Walkdown:</u> The inspectors performed a complete walkdown of the auxiliary feedwater system (AFW). This included the A and B motor driven AFW pumps and supporting equipment, the steam driven AFW pump and the steam supply to the pump turbine, and the condensate storage tank.

The detailed review included electrical power requirements, labeling, hangers and support installation, and associated support systems status. The walkdowns also included evaluation of system piping and supports against the following considerations:

- Piping and supports did not show evidence of water hammer
- Oil reservoir levels indicated normal
- Snubbers did not indicate any observable hydraulic fluid leakage
- Component foundations were not degraded

<u>Partial System Walkdowns:</u> The inspectors performed three partial system walkdowns during this inspection period:

- The A motor driven AFW pump during maintenance activities on the B motor driven AFW pump
- The motor driven fire pump during maintenance on the diesel driven fire pump
- Portions of the A train of the safety injection (SI) system with the C SI pump outof-service (OOS)

To evaluate the operability of the selected train or system when the redundant train or system was inoperable or OOS, the inspectors checked for correct valve and power alignments by comparing positions of valves, switches, and electrical power breakers to the procedures and drawings listed below as well as applicable chapters of the Updated Final Safety Analysis Report (UFSAR).

- Technical Specification (TS) 3.7.4, AFW System
- TS 3.7.5, Condensate Storage Tank
- Operating Procedure (OP)-402, AFW System
- System Description (SD)-042, AFW System

- AFW Drawing G-190197
- OP-202, Safety Injection and Containment Vessel Spray System
- Engineering Surveillance Test (EST)-40, Leak Test SI-864 A&B and SI-856 A& B
- Drawing 5379-1082, Safety Injection System Flow Diagram
- Drawing HBR2-8255 Fire Protection System Intake Structure Flow Diagram
- Action Request (AR) 90195, SI 924 Found out of Position

#### b. Findings

<u>Introduction:</u> A Green non-cited violation (NCV) of TS 5.4.1 was identified for a mispositioned valve that resulted in a non-rated (quality) pipe cap serving as a boundary in the safety injection system.

<u>Description</u>: On April 10, 2003, the inspectors conducted a partial system walk down of the SI system with the C SI pump OOS for scheduled maintenance. During the system walk down the inspectors observed that valve SI-924 was in the full open position rather than the closed position as required by OP-202. Valve SI-924 is a 3/4" vent line located on the discharge piping that runs from the refueling water storage tank (RWST) to the SI pumps, the residual heat removal (RHR) pumps and the containment spray (CS) pumps. A subsequent licensee investigation concluded that the valve was probably in the open position from its last known manipulation on or about November 1, 2002, during the performance of EST-140, until its discovery on April 10, 2003.

<u>Analysis:</u> The deficiency had a credible impact on safety because the mispositioned valve resulted in a non-quality controlled component (pipe cap) serving as a boundary in the SI system. The mispositioned valve could have resulted in loss of RWST inventory, flooding of the compartment and subsequent damage to the SI, RHR and CS pumps located in the vicinity of valve SI-924. During an SI initiation, with valve SI-924 open, the pipe cap is exposed to a pressure that is directly related only to the level of the RWST. However, when the recirculation phase is required from the emergency core cooling system (ECCS) sump, a single failure with valve SI-924 open could result in the pipe cap being exposed to 200 PSIG during cold leg recirculation. The finding was determined to be of very low safety significance (Green) because any significant leakage would have caused the auxiliary building sump level to increase, alerting the control room. Further, the pipe cap had not exhibited any leakage.

<u>Enforcement:</u> TS 5.4.1, Procedures, requires that written procedures be implemented covering the activities in Regulatory Guide 1.33, Revision 2, Appendix A, which includes procedures for valve alignment during power operations. Contrary to the above, with valve SI-924 in the open position, instead of the required closed position, OP-202 was not adequately implemented. Because the failure to maintain the required valve position on valve SI-924 is of very low safety significance and has been entered into the corrective action program, AR 90195, this violation is being treated as an NCV, consistent with Section VI.A of the NRC Enforcement Policy: NCV 50-261/03-04-01, Failure to Adequately Implement a Safety Injection and Containment Vessel Spray System Operating Procedure.

#### 1R05 Fire Protection

#### a. Inspection Scope

The inspectors walked down accessible portions of the six areas described below to assess the licensee's control of transient combustible material and ignition sources, fire detection and suppression capabilities, fire barriers, and any related compensatory measures. As part of the inspection, the inspectors reviewed the licensee's Fire Hazard Analysis, UFSAR Section 9.5.1A, to ascertain the requirements for fire protection design features, fire area boundaries, and combustible loading for these areas. Documents reviewed during the inspection are listed in the Attachment. The following areas were inspected:

- Dedicated shutdown diesel (DSD) room and fuel storage area
- Turbine lube oil deluge system, lube oil storage area, and turbine building fire water supply valves
- Emergency bus rooms E1 and E2
- Secondary control panel room
- Intake area during actual fire of the B circulating water pump motor
- Hagan relay room

The inspectors responded to an actual fire that occurred on April 26 at the B circulating water pump motor. The inspectors evaluated the following attributes:

- Protective clothing/self contained breathing apparatus properly worn
- Adequacy of fire hoses
- Adequacy of fire fighting equipment
- Adequate communications
- Emergency classification
- Fire brigade staffing
- b. Findings

No findings of significance were identified.

#### IR06 Flood Protection Measures

a. Inspection Scope

The inspectors reviewed the licensee's analysis of the affects of internal flooding as described in the UFSAR. In particular, the inspectors verified the calibration frequency of the auxiliary building sump tank level transmitters. The auxiliary building sump tank level alarm is indicative of potential flooding in the auxiliary building hallway. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

### IR07 Heat Sink

#### a. Inspection Scope

Using the requirements in Corrective Maintenance Procedure, CM-201, Safety Related and Non-Safety Related Heat Exchanger Maintenance, the inspectors reviewed the licensee's activities associated with the cleaning of the tube side of the B component cooling water (CCW) heat exchanger on April 8-9. The CCW heat exchanger shell side is cooled by service water (SW).

#### b. Findings

No findings of significance were identified.

# IR11 Licensed Operator Requalification

#### a. <u>Inspection Scope</u>

On April 29, the inspectors observed licensed operator requalification training and examination activities which included a simulator evolution. The observed scenario involved a combination of failures including a reactor trip and a steam generator tube rupture. The inspectors assessed licensed operator performance during the evolution to verify that the crew correctly diagnosed abnormal conditions and that the appropriate emergency operating procedures were used when necessary. The inspectors observed the effectiveness of command and control demonstrated by the crew. Documents reviewed are listed in the Attachment.

## b. Findings

No findings of significance were identified.

#### 1R12 Maintenance Effectiveness

#### a. Inspection Scope

The inspectors assessed the effectiveness of the licensee's maintenance efforts by evaluating three conditions that occurred during the inspection period. The inspection determined the risk significance of the condition, licensee implementation of the Maintenance Rule (MR) (10 CFR 50.65) with respect to characterization of failures, the appropriateness of the associated MR a(1) or a(2) classification as well as the associated performance criteria, and the utilization of the corrective action program. Documents reviewed are listed in the Attachment. The specific conditions evaluated by the inspectors included:

- Failure of containment shield wall heating ventilation recirculation (HVH) cooling fan HVH-9B
- Failures of the A charging pump
- Repetitive failure of radiation monitor R-14

## b. Findings

No findings of significance were identified.

## 1R13 Maintenance Risk Assessments and Emergent Work Evaluation

## a. Inspection Scope

The inspectors reviewed licensee risk assessments for the four maintenance-related plant activities described below. The inspectors reviewed the implementation of 10 CFR 50.65 (a)(4) requirements during these scheduled and emergent maintenance activities using Operations Management Manual OMM-048, Work Coordination and Safety Assessment. The inspectors reviewed the effectiveness of licensee actions to plan and control the scheduled work to minimize overall plant risk while the emergent work items were being addressed. The inspectors also reviewed the applicable plant risk profiles, work week schedules, and associated maintenance work requests.

- Emergent work involving cooling fan replacement on startup transformer
- Scheduled work involving condenser vacuum pump and deepwell pump coincident with reactor protection channel maintenance
- Scheduled maintenance on steam driven AFW pump
- Turbine valve testing (OST 551)

Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

## 1R14 Personnel Performance During Non-Routine Plant Evolutions

## a. Inspection Scope

On April 5 the plant experienced two over-power delta temperature (OPDT) runbacks during calibration activities being conducted in accordance with Engineering Change (EC) 47162 and Procedure MST-003, Tavg and Delta-T Protection Channel Testing. For these non-routine events, the inspectors reviewed operator logs and evaluated operator performance and response to verify that the response was in accordance with approved plant procedures. The inspectors also reviewed the cause of the runbacks, the subsequent licensee evaluation, corrective actions, and the night order that was issued to preclude recurrence. Documents reviewed are listed in the Attachment.

b. Findings

<u>Introduction:</u> A Green NCV of TS 5.4.1, Procedures, was identified for failure to follow Abnormal Operating Procedure (AOP)-15, Secondary Load Rejection, following the two April 5, 2003, turbine runbacks. The turbine runbacks occurred when the loop 3 OPDT bistable was tripped for calibration and the loop 2 OPDT channel spuriously actuated,

thus meeting the two out of three logic for turbine runback. The turbine runback occurs approximately 3 percent prior to a reactor trip.

Description: Prior to April 5, loop 2 OPDT channel had spuriously actuated on several occasions due to hot leg streaming. However, the operating shift did not specifically correlate this to a reduction in operating margin during the normalization activities. During the normalization and calibration activities on April 5, loop 1 of OPDT was successfully completed. Then during loop 2 calibration, several spurious annunciators associated with OPDT turbine runback/rodstop were received. However, with the loop 2 bistable in trip condition due to the normalization activities, the 2 out of 3 logic was not met and no runback occurred. Subsequently, during loop 3 normalization, the loop 3 bistables were tripped as required. During the normalization of loop 3, the loop 2 OTDT turbine runback setpoint was reached due to a momentary spurious actuation of the loop 2 channel. With loop 3 bistable already in the trip position, a runback and load reduction of approximately 34 MW was noted. The control room did not recognize the cause of the runback because the bistable did not stay locked. Consequently, AOP-15 was entered. Control rods were manually inserted in an attempt to match Tavg and Tref in accordance with AOP-15, which directs the insertion of control rods or RCS boration to match Tave and Tref. The Tave and Tref were apart by approximately 4 degrees F. The control room shift supervisor (CRSS) marked this step as not yet complete with a place-maker and proceeded further into the procedure. At this point, reactor power had dropped approximately 1 percent, but the Tavg and Tref mismatch still existed. The CRSS then requested that turbine power be raised to match Tavg and Tref. This action was not in accordance with AOP-15 which specifically only calls for rod insertion or boration for temperature control.

As a result of returning to 100 percent (by increasing the turbine load) and not properly identifying the cause of the first runback, a second runback occurred. The operators recognized the cause of the second runback and loop 3 bistable was restored prior to raising power back to 100 percent.

<u>Analysis:</u> The failure to follow AOP-15 had a credible impact on safety and is greater than minor because the turbine load action was non-conservative. The finding was determined to be of very low safety significance (Green) because TS limits were not exceeded and the power increase by the operators following the runbacks was very small and did not approach reactor protection system setpoints.

<u>Enforcement:</u> TS 5.4, Procedures, requires that written procedures be established, implemented, and maintained covering activities specified in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978, which includes procedures for combating plant transients. AOP-15 requires that Tref and Tavg temperature control be maintained by either inserting control rods or by boration. Contrary to AOP-15, on April 5, turbine load was increased for temperature control in an attempt to match Tavg to Tref. This violation is being treated as an NCV, consistent with Section VI.A of the NRC Enforcement Policy: NCV 50-261/03-04-02, Failure to Follow Load Rejection Abnormal Operating Procedure.

## 1R15 Operability Evaluations

### a. Inspection Scope

The inspectors selected three operability evaluations/ECs/ARs affecting the risk significant mitigating system equipment listed below to assess as appropriate: (1) the technical adequacy and accuracy of the evaluations; (2) whether continued component or system operability was justified; and (3) whether other existing degraded conditions were considered for compensatory measures. Documents reviewed are listed in the Attachment.

- CCW auto start circuitry and consequent loading of the E1 and E2 emergency buses
- HVH units 6A and 6B
- HVH units 8A and 8B

# b. Findings

No findings of significance were identified.

## 1R16 Operator Work-Arounds

a. Inspection Scope

The inspectors performed a review of an existing operator work-around involving the dedicated shutdown diesel generator vent fan that was OOS. The review considered the effect of the work-around on the operators' ability to implement AOPs or emergency operating procedures. The inspectors reviewed actions prescribed for the work-around to determine if the functional capability of the systems and personnel in responding to an initiating event was affected. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

## 1R19 Post Maintenance Testing

a. Inspection Scope

The inspectors witnessed the following seven post-maintenance tests (PMT) and reviewed the test data to verify that the tests were adequate for the scope of maintenance and that the acceptance criteria and test results demonstrated the operational readiness of the structures, systems and components (SSCs) in accordance with the TS. Documents reviewed are listed in the Attachment. The activities were selected based on a risk assessment associated with the scheduled or emergent activity.

• OST-902, Containment Fan Coolers Component Test

- OST-925, Containment Fan Coolers Valve Position Indicator Verification
- OST-701-5, Reactor Coolant System In-Service Inspection Valve Test (Quarterly)\*
- OST-646, Fire Suppression Water System Engine Driven Fire Pump Test (Annual)
- OST 101-1, CVCS Component Test Charging Pump A\*
- EST-112, Pressure, Safety, and Relief Valve Bench Testing
- RHR Train B OST-252, RHR System Valve Test Train B\*

\*In Service Test

b. <u>Findings</u>

No findings of significance were identified.

- 1R22 <u>Surveillance Testing</u>
- a. Inspection Scope

The inspectors witnessed the following three surveillance tests and reviewed test data to verify that the surveillance test results demonstrated that the selected risk significant SSCs were capable of performing their intended safety functions. Specifically, the inspectors considered the following: requirements of the TS, UFSAR and American Society of Mechanical Engineers (ASME) Section XI, pre-conditioning, plant risk, appropriate acceptance criteria, adequate test equipment, procedure adherence, completeness of data, adequate test frequency, and configuration control. Documents reviewed are listed in the Attachment.

- OST-11, Rod Cluster Control Exercise & Rod Position Indication Monthly
  Interval
- EST 145, Determination of Control Rod Position using the Movable Incore
   Detector
- OST-251-1, RHR Pump A and Components Test
- b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

- 1EP6 Drill Evaluation
  - a. Inspection Scope

The inspectors observed and evaluated the licensee's conduct of an emergency preparedness drill held on April 1. The inspectors evaluated licensee response for the Joint Information Center. The inspectors observed the mock media press conference, development of press releases, and licensee response to mock public phone inquires.

The inspectors observed the post drill critique, to verify the licensee's ability to assess drill performance. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

#### 4OA1 Performance Indicator Verification

a. Inspection Scope

The inspectors sampled licensee submittals for the performance indicators (PIs) listed below to verify the accuracy of reported PI data. PI definitions and guidance contained in NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Rev. 2, were used to verify the basis in reporting for each data element.

#### Mitigating Systems Cornerstone

- High Pressure Injection System Unavailability
- Emergency AC Power System Unavailability
- Heat Removal System Unavailability

The inspectors reviewed operator logs, attended plant meetings, and routinely toured the plant, including the control room, to maintain awareness of plant status. The performance indicator data was verified for accuracy for the time frame of January 2003 through March 2003.

b. Findings

No findings of significance were identified.

#### 4OA3 Event Followup

#### Turbine Runback During Reactor Protection System Testing

On April 5, the plant experienced two OPDT turbine runbacks during calibration of the OPDT instrument channels. The resident inspectors responded to the site and reviewed plant conditions and licensee response to the event. Refer to section 1R14 of this report for details regarding licensee performance.

#### 4OA6 Meetings, Including Exit

On June 25, 2003, the resident inspectors presented the inspection results to Mr. Tim Cleary and other members of his staff. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

# SUPPLEMENTAL INFORMATION

# **KEY POINTS OF CONTACT**

# Licensee personnel:

R. Ivey, Operations Manager

- C. Church, Engineering Manager
- E. Caba, Engineering Superintendent
- D. Stoddard, Maintenance Manager
- E. Rothe, Nuclear Assurance Section Manager
- C. Burton, Director of Site Operations
- E. Kapopoulos, Ernie, Outage Management Manager
- T. Cleary, Plant General Manager
- W. Farmer, Engineering Superintendent
- J. Fletcher, Regulatory Affairs Manager
- S. Weise, Training Manager
- J. Moyer, Vice President, Robinson Nuclear Plant
- S. Young, Superintendent Security
- D. Crook, Supervisor Access Authorization
- A.G. Cheatham, Radiation Protection Superintendent
- R. Howell, Supervisor, Regulatory Support
- G. Ludlum, Superintendent Operations Training
- B. Clark, Manager Training

# NRC personnel:

P. Fredrickson, Branch Chief, DRP, RII

# LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

0001100
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None

<u>Closed</u>

None

Open and Closed

- 50-261/03-04-01 NCV Failure to Adequately Implement a Safety Injection and Containment Vessel Spray System Operating Procedure (Section 1R04)
   50-261/03-04-03 NCV Failure to Fallow Load Baiagtian Abaarmal Operating Procedure
- 50-261/03-04-02 NCV Failure to Follow Load Rejection Abnormal Operating Procedure (Section 1R14)

# **Discussed**

None

# LIST OF DOCUMENTS REVIEWED

## Section 1R05: Fire Protection

UFSAR Section 9.5.1, 9.5.1A OMM-002, Fire Protection Manual FP-003, Control of Transient Combustibles RNP-M/MECH-1694, Eval. Of Non-Standard Fire Barrier Penetration Seals in Fire Zone 23 Engineering Evaluation No: 85-01

#### Section 1R06: Flood Protection Measures

MMM-006, Appendix B-6, Instrument Calibration PMID 0001936, Calibrate sump tanks W/O 61247 for LT 1000A and B W/O 204662 for LT 1000A and B

#### Section 1R11: Licensed Operator Requalification

Emergency Action Level Matrix FSS-SEG-9, Operations Training Full Scope Training, Rev 7

#### Section 1R12: Maintenance Rule Effectiveness

ADM-NGGC-0101, Maintenance Rule Program RNP Maintenance Rule Database Maintenance Rule Reports For HVAC Containment Building System, CVCS System, and Process Area Radiation Monitoring

#### Section 1R13: Maintenance Risk Assessments and Emergent Work Evaluation

OMM-48, Work Condition and Risk Assessment Plant Logs TS3.8, Electrical Systems OST 551 SD for AFW TS 3.7

#### Section 1R14: Personnel Performance During Non-Routine Plant Evolutions

AR 89711, OPDT Runbacks TS 3.3, Instrumentation Engineering Change 47162R12 AOP-15, Secondary Load Rejection Drawing No: CP-300-5379-2756, Logic Diagram, Primary Coolant System Signals OWP-028, Tavg/Delta Temperature Protection, Rev 8 MST-003, Tavg and Delta T Protection Channel Testing

## Section 1R15: Operability Evaluations

EGR NGGC-0005, Engineering Change

# Section 1R16: Operator Work-Arounds

OMM-001-8, Operator Work-Arounds Operator Logs Drawing DSP-001, Alternate Shutdown Diagnostic SD Dedicated Shutdown Diesel

# Section 1R19: Post Maintenance Testing

PLP-033, Post Maintenance Testing (PMT) Program H.B. Robinson Inservice Testing Database OMM-015, Operations Surveillance Testing ASME, Section XI

## Section 1R22: Surveillance Testing

TMM-004, Inservice Testing Program

# Section 1EP6: Drill Evaluation

EPJIC-00, Activation and Operation of the Joint Information Center EPJIC-01, Company Spokesman EPJIC-02, Joint Information Center Director EPJIC-03, Technical Spokesperson EPJIC-04, Public Information Coordinator/Specialist EPJIC-05, Administrative and Badging Staff EPJIC-00, Joint Information Center Generic Information

# Section 40A1: Performance Indicator Verification

REG-NGGC-0009, NRC Performance Indicators Licensee NRC Performance Indicator Notebook Operator Logs/Key word search RNP Maintenance Rule Database