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Carolina Power & Light Company

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Office of Inspection and Enforcement
ATTN: Mr. Norman C. Moseley, Director
Division of Program Development
and Appraisal
United States Nuclear Regulatory Commission
Washington, D.C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO PERFORMANCE APPRAISAL
INSPECTION REPORT 50-261/81-05 (PAS)

Dear Mr. Moseley:

Summary

Carolina Power and Light Company (CP&L) provides the following response to the NRC Performance Appraisal Inspection, conducted at the H. B. Robinson (HBR) Plant on June 22 - July 17, 1981. This inspection identified the management controls associated with the corrective action system as below average. The following conclusion was given in the report:

"The corrective action program appeared fragmented and not well defined. Awareness and training were weak. There was no overall program for identifying and tracking problems to ensure evaluation and closure. The most significant weakness was the failure to develop a comprehensive trend analysis system. The human factors screening and evaluation system should prove to be one viable method of corrective action when fully implemented."

This response addresses CP&L's overall approach to corrective action systems, including proposed enhancements. Also, attached is an enclosure which specifically addresses each weakness identified in the inspection report Section 7 regarding corrective action systems.

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Executive Office of the President, 1600 Pennsylvania Avenue, N.W., Washington, D.C. 20502

Discussion

While enhancements of CP&L's existing corrective action program at HBR are planned, CP&L believes that the existing program is, none-the-less, effective. Each functional unit at the HBR Plant has its own corrective action systems, which are geared to the unique actions required in each area. Examples of the systems currently in place, are QA Nonconformance Reports, Plant Operating Experience Reports, Outstanding Action Item Lists, Plant and Subunit Tickler Systems, Personnel Contamination Records, Human Factor Evaluations and Corporate Nuclear Safety LER Trending. These systems provide each Plant subunit with the mechanism to track and resolve items requiring corrective action.

CP&L recognizes that enhancements in the corrective action program would be beneficial, and we intend to document our policy on corrective action programs in the form of a Nuclear Operations Department Procedure.


This procedure will be implemented at H. B. Robinson via a plant procedure in which the Plant Staff will identify the areas to be covered by the corrective action program. The Plant Staff will review the corrective action systems currently in place to ensure that they meet the criteria established in the Nuclear Operations Department Corrective Action Program Procedure. Where weaknesses are identified, procedure changes will be implemented, in the Plant Operating Manual, to correct these weaknesses. Once the procedures described above are in place, training of all plant personnel will be conducted to ensure that they understand how the corrective action system in their work area functions. This training will also include an overview of all corrective action systems within the plant.

In summary, CP&L believes the current corrective action program at HBR to be effective. However, in an effort to enhance the existing program, changes to ensure a consistent corrective action policy will be made. These changes will more clearly define the basis of the program and how it ties together. Plant personnel will be trained, in general, as to the importance of the corrective action program. Specifically, they will be trained in the portions of the corrective actions program which applies to their work areas.

The procedure changes and employee training described in this letter will be completed by March 1, 1982.

Should you have any questions regarding this information, please contact my staff.

Yours very truly,



E. E. Utley

Executive Vice President
Power Supply and
Engineering & Construction

FMG/DS/lr (3912)
Enclosure

cc: Mr. James P. O'Reilly

Enclosure

Response To Identified Weaknesses
In The HBR Corrective Action Program

This enclosure addresses each weakness identified in Section 7 "Corrective Action Systems" of the PAS Report. Each observation is identified by the numbering system used in the inspection report. Also included is the tracking number being used by the H. B. Robinson Resident Inspector to followup on these items.

Observation:

7.a.(1) Item 1

"Training in corrective action was not specifically provided to either corporate or site personnel." (IER-81-27-19)

Response:

CP&L believes that personnel are aware of the corrective action program in their work area. However, in an effort to ensure that appropriate personnel understand the importance of the corrective action program and how they interface with it, training will be held on the program after the changes described in this letter are made.

Observation:

7.a.(1) Item 2

"The implementing corporate and site procedures for nonconformance control and corrective action were not designed for interdisciplinary use but only by the QA organizations. The procedures did not appear to meet the intent of the attachment to CP&L's March 18, 1981, letter to the NRC which implied a corporate wide system of effective corrective action." (IER-81-27-19)

Response:

The nonconformance program in use by the QA organizations is only one of several corrective action programs in use at HBR. CP&L believes that it is not practical to have one single procedure to cover all types of deficiencies; therefore, although the various corrective action programs will be strengthened they will continue as separate entities. However, to ensure the programs are tied together and consistent a department and plant procedure will be written to provide policy guidance for specific corrective action programs.

Observation:

7.a.(1) Item 3

"The nonconformance report had limited application. Conditions adverse to quality or safety occurring in areas such as operations, security, engineering, plant modifications, housekeeping, and training were not routinely identified on the nonconformance report." (IER-81-27-19)

Response:

Procedures will be reviewed and revised as necessary to insure all deficiencies are covered by a corrective action system.

Observation:

7.a.(1) Item 4

"There was no single person, group, or method of tracking all identified problems in order to evaluate, trend, analyze, and ensure that measures had been taken to reduce or eliminate recurrence of the problems," (IER-81-27-19)

Response:

CP&L does not believe it is practical or necessary to have one person or group track, evaluate, analyze and trend all deficiencies. Each functional unit is responsible for deficiencies in their area. The Plant General Manager is responsible for the overall review of all these programs." See response to 7.a.(1) Item 2.

Observation:

7.a.(2)

"Awareness of the corrective action program was limited to areas where items of noncompliance, reportable occurrences, or corporate audit findings were identified. Interviews revealed that the personnel awareness of the corrective action program in the areas of health physics, security, fire protection, maintenance and operations was limited." (IER-81-27-20)

Response:

CP&L believes that each employee involved in plant related activities should be aware and understand how the corrective action system functions in their work area. Additionally, they should have a general understanding of other corrective action systems. These areas will be covered by the proposed training.

Observation:

7.a.(3)

"Written management controls had not been established for distribution, review, and resolution of problems identified in Corporate audit findings, NRC inspection reports, and IE Bulletins, and Circulars. A followup action item list was maintained informally by the Site Surveillance Group and appeared to be adequate. Open items were tracked, followed, and closed. The licensee planned to implement a formalized program by August, 1981." (IER-81-27-21)

Response:

These items are now being followed by the newly formed Regulatory Compliance Subunit at the plant. This group is currently following the previously established informal procedures (Outstanding Action Item List) used to control distribution, review and resolution of problems identified in Corporate

audit findings, NRC inspection reports, and IE Bulletins and Circulars. CP&L believes that this system has been effective in assuring timely responses to Corporate audit findings, NRC inspection reports, and IE Bulletins, Circulars, and Notices. However, written Regulatory Compliance Subunit procedures are currently under development and will be implemented by March 1, 1982.

Observation:

7.a.(4)

"Implementation of the corrective action program was displayed on graphs which indicated numbers of reportable occurrences, items of noncompliance, audit findings, surveillances, and Corporate Nuclear Safety items. Cause codes, such as operator error, procedure weakness, and material discrepancy were included for reportable occurrences only. Except for a plot of numbers from the data accumulated, no apparent analysis of the deficiencies had been performed. A trend analysis program had not been developed for review of audit findings, surveillance reports, nonconformance reports, maintenance work requests, or other types of deficiency reports to determine if generic, repetitive or impending problems existed with management, personnel, materials, procedures, systems, or components." (IER-81-27-22)

Response:

CP&L acknowledges that a formal written program for trend analysis is not currently available; however, trending on specific programs has been and continues to be done on a regular basis. CP&L believes that trend analysis of specific programs are important and therefore will implement procedure changes to ensure that specific corrective action systems, which CP&L identifies as benefiting from such a program, will have a trend analysis program.

Observation:

7.a.(5)

"A program was not established to assimilate and analyze identified conditions adverse to quality such as personnel errors, procedure deficiencies, equipment malfunctions, significant operation events, and event reports for adverse trends. Additionally, conditions adverse to quality which were documented in logs, data sheets, and checklists were not routinely accumulated and analyzed for adverse trends." (IER-81-27-23)

Response:

Each corrective action system benefiting from such a program will be reviewed to assure that trending and analysis of deficiencies is an integral part of the system. In addition, the plant procedure which ties all of the corrective action systems together will address trending and analysis of each of the corrective action systems benefiting from such a program.