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 AUTH.NAME AUTHOR AFFILIATION
 LETZ,C.R. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Suppl response to violations noted in Insp Rept
 50-261/89-11.Corrective actions:

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Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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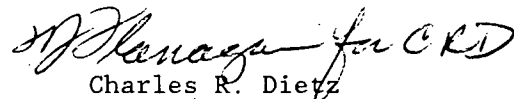
Gentlemen:

By letter dated October 16, 1989, Carolina Power and Light Company (CP&L) provided a reply to the Notice of Violation identified by NRC Inspection Report No. 50-261/89-11. This Inspection Report also identified a number of weaknesses which were designated as Inspector Follow-up Items (IFI). The letter transmitting the Inspection Report requested that CP&L respond to each IFI with a statement of the intended corrective actions and the dates that these actions would be completed. Based on discussions between CP&L and NRC Region II Management, an extension of 30 days beyond the original due date was considered appropriate to facilitate response to these Inspector Follow-up Items.

Please find enclosed as Attachment I a listing of these Inspector Follow-up Items, along with a statement of the intended corrective action(s) for each and a projected date for completion of these actions. The submittal of this information completes CP&L's response to the subject Inspection Report.

Should you have any questions concerning this submittal, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,


Charles R. Dietz

Manager

Robinson Nuclear Project Department

8911280382 891115
PDR ADOCK 05000261
Q PNU

CTB:lht

Attachments

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO

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Response To 50-261/89-11 Inspector Follow-Up Items

89-11-05-URI CCW Heat Exchanger Adequacy in Performing Its Intended Design Functions (paragraph 4.b)

Calculations have been completed which indicate that the CCW heat exchangers are capable of performing their intended function. These calculations assume the current level of tube plugging, plus additional margin for conservatism and to bound the expected normal and worst case conditions. In addition, as detailed in NRC Inspection Report No. 50-261/89-17, actual system performance data has been used to verify that the CCW heat exchanger heat removal capability is within design requirements. No further actions are planned with regard to this item.

89-11-06-IFI Independent Verification Procedures Should Be Improved (paragraph 2.b)

The four items for potential improvement identified in the Inspection Report will be reviewed and evaluated for incorporation into the site independent verification program. Appropriate program enhancements will be incorporated into plant procedure PLP-030, "Independent Verification," by July 1, 1990.

89-11-07-IFI Freeze Protection Measures for RWST and Steam Rupture ESF Detectors are Inadequate (paragraph 2.c)

To address the various concerns identified within the Inspection Report, a number of actions will be taken.

To ensure adequate monitoring of freeze protection circuits, Operations personnel will develop and implement upgraded guidance for initiating and documenting the monitoring of these circuits. Also, the frequency of monitoring will be specified at an interval which will provide adequate surveillance. This activity will be completed with appropriate changes implemented by March 30, 1990.

Other circuits cannot be directly monitored by Operations personnel and require Instrumentation and Control (I&C) personnel to perform periodic monitoring. For these circuits, I&C personnel will review the adequacy and frequency of monitoring. Appropriate enhancements to the I&C monitoring functions will be established and implemented by March 30, 1990.

To help improve Operator knowledge of freeze protection circuits, appropriate Training Lesson Plans will be revised to include more detailed information on the design and

operation of the freeze protection system. This information will be covered in the 1990 sessions of Continued Training. These Lesson Plan changes will be implemented and associated training sessions completed by March 30, 1990.

89-11-08-IFI

Annunciator Panel Procedure Weaknesses (paragraph 2.f)

A review of the Annunciator Panel Procedures (APP) will be performed to address the Examples of APP Weaknesses identified in Appendix E of the Inspection Report. This review will also be directed toward an overall improvement in the quality and usability of these procedures.

A review of the APPs is also required to support an Annunciator System Upgrade Project which was required as a result of the Control Room Design Review. The APPs will be revised and validated in conjunction with the upgrade of the annunciator system. As currently scheduled, the Annunciator System Upgrade Project will be completed prior to startup from Refueling Outage 14. The upgrade of the APPs will be completed concurrently.

89-11-09-IFI

Weakness in Loop Calibration of Feedwater RTD Used in Calorimetric (paragraph 2.g)

The Inspection Report discussed a number of issues involving the main feedwater resistance temperature detectors (RTD) and their ability to provide accurate input to the reactor power calorimetric calculation. The reliability and accuracy of these RTDs is recognized as an important factor in the development of an accurate calculation for reactor core thermal power. As such, the concerns identified will be reviewed to determine appropriate measures which can be taken to ensure accurate feedwater temperature inputs to the calorimetric calculation. This review will be completed with appropriate changes implemented by March 30, 1990.

89-11-10-IFI

Deficiencies Noted in Service Water and Component Cooling Water Walkdown (paragraphs 2.h and 4.e)

Service Water System

The deficiencies identified in Appendix B of the Inspection Report have been reviewed. A response to each area of comment is provided below:

1. All valves and components which were identified as not being properly labeled will be properly labeled by January 15, 1990.

2. Discrepancies identified between the installed system and the system drawings will be examined. Appropriate changes will be initiated by January 15, 1990, with required changes implemented within 30 working days of initiation.
3. The overranged pressure indicator, PI-6623, has been replaced with a new, calibrated pressure gauge. This replacement was completed on October 11, 1989.
4. The rubber hose found connected downstream of SW-219 to the lube oil separator did not have an associated Caution Tag or Temporary Modification. This hose has been removed.

Component Cooling Water System

The deficiencies identified in the Inspection Report have been reviewed. A response to each area of comment is provided below:

1. All valves which were identified as not being properly labeled will be properly labeled by January 15, 1990.
2. As stated in the Inspection Report, CC-851C, root isolation valve for pressure indicator PI-641C, was found improperly positioned and was immediately repositioned in accordance with procedural requirements. An investigation of this incident was performed which included a review of applicable maintenance activities, surveillance tests, and special performance tests which could have resulted in the mispositioning of this valve. No definitive cause has been identified which explains this discrepancy.

A Nonconformance Report (NCR No. 89/036) was issued on August 3, 1989, to document and track this discrepancy. As stated in the response to this NCR, the corrective action to preclude recurrence will involve the review and re-emphasis of administrative procedural requirements which specify that valves are only to be operated in accordance with approved plant procedures. These procedural requirements will be reviewed with shift operating personnel, and with the Performance and Systems Subunits of the Technical Support Unit. This review will be completed by January 15, 1990.

89-11-11-IFI

Lack of a Time Limit for Incorporation or Evaluation of Comments Made in Plant Procedure Two Year Review (paragraph 2.j)

To address the weaknesses identified within the Inspection Report, a project will be initiated to establish and implement appropriate enhancements to the Biennial Procedure Review process. Specifically, a time limit will be established for incorporation or evaluation of comments made during performance of the Biennial Review. Also, the administrative and technical guidance for performance of Biennial Reviews will be evaluated and strengthened where appropriate. The specific details of these program enhancements will be finalized and incorporated into the appropriate procedure(s) by August 31, 1990.

89-11-12-IFI

Weakness in Operations Corrective Action Program (paragraph 2.k)

The Inspection Report identified several weaknesses in the Operations Corrective Action Program. A review of these items will be performed to determine an appropriate plan for their resolution. Appropriate changes to the Operations Corrective Action Program will be defined and implemented by September 1, 1990.

89-11-13-IFI

Timeliness of Operability Reviews of Problems Discovered in the Design Basis Reconstitution (paragraph 3.c)

The Inspection Report identified a concern relative to the timeliness of operability reviews resulting from discrepancies identified during the Design Basis Reconstitution. Existing procedures associated with the Design Basis Reconstitution require that each discrepancy be entered into the Discrepancy Resolution Information Program to review the discrepancy against a specific set of proceduralized criteria. This review is documented as an abstract which is attached to the associated discrepancy. Each week, this information is provided to site management.

To date, three (3) discrepancies have been identified which resulted in operability concerns. In each case, the initial reviews necessitated an escalation of effort within the Discrepancy Resolution Program. Without exception, these reviews resulted in a timely notification to site management, and in no instance was the time from initial discovery to site notification greater than five working days. Also, a CP&L Independent Assessment Team reviewed the Discrepancy Resolution Program as one part of an investigation into the Auxiliary Feedwater Pump Net Positive Suction Head issue. This independent assessment resulted in no recommendations to alter the Discrepancy Resolution

Program as it is presently structured. As such, there are currently no plans to change the existing program.

89-11-14-IFI

Review Implementation of MOD-018, Revision 4, and MOD-013, Revision 5, in Temporary Modification Program (paragraph 3.g)

As discussed within the Inspection Report, a program has been initiated to implement improvements to the Temporary Modification Program. This will be accomplished by implementation of a revised and upgraded Temporary Modification procedure, MOD-018, "Temporary Modifications." This procedure upgrade will be completed by March 2, 1990.

Also discussed within the Inspection Report is an on-going program to evaluate possible methods for upgrading and standardizing the safety review process at CP&L's nuclear sites. Following completion of this program, a site-specific procedure will be implemented for performance of 10CFR50.59 safety reviews. This procedure will be implemented by March 2, 1990.

89-11-15-IFI

Validation of Critical Design Parameters in DBD (paragraph 3.c)

As described by CP&L at the October 2, 1989, NRC Enforcement Conference in Atlanta, enhancements to the Design Basis Reconstitution process are being implemented. These enhancements include accelerating the Chemical and Volume Control System Design Basis Document, and re-prioritizing the validation effort for the Service Water and HVAC Systems.

It is important to note that the validation process is organized to validate the Design Basis Document, as opposed to the as-built condition of the plant. This process is not designed to include validation of detailed system design, nor is it designed for configuration management. Rather, the validation process is designed to ensure that safety system design meets functional, code, and licensing requirements. This approach has been presented to both NRC Region II and the NRC Office of Nuclear Reactor Regulation (NRR). However, if as-built design requirement deficiencies are identified, they are included in the resulting validation report and reported to site management in accordance with the Discrepancy Resolution Information Program previously described within the response to 89-11-13-IFI.