

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9107290272 DOC.DATE: 91/07/23 NOTARIZED: NO DOCKET #  
 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
 AUTH.NAME AUTHOR AFFILIATION  
 DIETZ,C.R. Consumers Power Co.  
 RECIP.NAME RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk)

SUBJECT: Provides response to notice of violation re NRC Insp Rept  
 50-261/91-14.Corrective actions:shift supervisor log amended  
 to include necessary entry into Section 3.0 of Tech Spec  
 LCO.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 2  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

### NOTES:

|           | RECIPIENT<br>ID CODE/NAME | COPIES<br>LTTR ENCL | RECIPIENT<br>ID CODE/NAME | COPIES<br>LTTR ENCL |
|-----------|---------------------------|---------------------|---------------------------|---------------------|
|           | PD2-1 PD                  | 1 1                 | LO,R                      | 1 1                 |
| INTERNAL: | AEOD                      | 1 1                 | AEOD/DEIIB                | 1 1                 |
|           | AEOD/TPAB                 | 1 1                 | DEDRO                     | 1 1                 |
|           | NRR MORISSEAU,D           | 1 1                 | NRR SHANKMAN,S            | 1 1                 |
|           | NRR/DLPQ/LPEB10           | 1 1                 | NRR/DOEA/OEAB             | 1 1                 |
|           | NRR/DREP/PEPB9H           | 1 1                 | NRR/DST/DIR 8E2           | 1 1                 |
|           | NRR/OTSB 11E22            | 1 1                 | NRR/PMAS/ILRB12           | 1 1                 |
|           | NUDOCS-ABSTRACT           | 1 1                 | OE DIR                    | 1 1                 |
|           | OGC/HDS2                  | 1 1                 | REG FILE 02               | 1 1                 |
|           | RGN2 FILE 01              | 1 1                 |                           |                     |
| EXTERNAL: | EG&G/BRYCE,J.H.           | 1 1                 | NRC PDR                   | 1 1                 |
|           | NSIC                      | 1 1                 |                           |                     |

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 22



Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550

JUL 23 1991

Robinson File No.: 13510E

Serial: RNPD/91-1819

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT

UNIT NO. 2

DOCKET NO. 50-261

LICENSE NO. DPR-23

NRC INSPECTION REPORT NO. 50-261/91-14 REPLY TO A NOTICE OF VIOLATION:

Gentlemen:

Carolina Power and Light Company hereby provides this response to the Notice of Violation identified in Inspection Report 50-261/91-14.

Severity Level V Violation (RII-91-14-03)

Technical Specification 6.5.1.1.1.a requires written procedures be implemented for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Item 1.h. of Appendix A to Regulatory Guide 1.33 requires administrative procedures for log entries. Operating procedure OMM-001, Revision 25, requires the Shift Foreman's Log to include any entry into a limiting condition for operation (LCO).

Contrary to the above, procedure OMM-001 was not implemented in that, on May 19, 1991, entry into the Technical Specification 3.0 LCO was not documented in the Shift Foreman's Log.

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. The requirement to document an LCO entry in the Shift Supervisor's log was overlooked due to ongoing plant conditions. The Shift Supervisor's log entries at the time clearly indicate that the Technical Specifications were reviewed and that his efforts were concentrated on the immediate reportability of the event. The individual was aware at the time that Section 3.0 of the Technical Specifications applied as indicated in the Inspection Report. The violation occurred due to an administrative oversight.

IEO  
1/0

Letter to United States Nuclear Regulatory Commission  
Serial: RNP/91-1819  
Page 2

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

The Shift Supervisor's Log has been amended to include the necessary entry into Section 3.0 of the Technical Specification LCO. Additionally, the Shift Supervisor involved has been counseled about the importance of ensuring log entries are complete and in accordance with OMM-001 and OMM-023.

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

Sufficient corrective action has been taken to avoid further violation. However, the circumstances of this event will be reviewed during operator retraining to ensure consistent understanding by all watchstanders of the requirement for logging LCO's.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved as described above.

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

Very truly yours,



Charles R. Dietz  
Manager

Robinson Nuclear Project Department

PCHJ:kgs

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