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SUBJECT: Responds to NRC ltr re violations noted in insp rept  
50-261/92-22. Corrective actions: discussions held to heighten  
sensitivity of proper annunciation response & procedural  
compliance & adverse condition rept initiated.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
NRC INSPECTION REPORT NO. 50-261/92-22 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company provides this reply to the Notice of Violation identified within NRC Inspection Report No. 50-261/92-22.

Please find enclosed a discussion of the reasons for this violation, the corrective actions taken and planned, and the date when full compliance will be achieved.

Should you have any questions regarding this matter, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,

  
Charles R. Dietz  
Vice President

Robinson Nuclear Project Department

CTB:dwm

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

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REPLY TO A NOTICE OF VIOLATION

Severity Level V Violation (RII-92-22-01)

Technical Specification 6.5.1.1.1.a requires that written procedures be implemented for activities covered in Appendix A of Regulatory Guide 1.33, revision 2, February 1978. Appendix A, item 5, requires that each safety-related annunciator have its own written procedure. Alarm procedure APP-006-E7 was written to provide instructions to address high and low levels in the condensate storage tank (CST). This procedure requires the operator to stop the source of the CST makeup water.

Contrary to the above, on July 23, 1992, written procedures were not implemented in that when a CST high level alarm was received the source of the CST makeup water was throttled instead of being stopped as required by procedure APP-006-E7.

This is a Severity Level V violation.

Reply

1. The Reason for the Violation

CP&L acknowledges the violation as described. The reason for this violation has been identified as personnel error in that the individuals involved did not adhere to the procedural requirements provided within Annunciator Panel Procedure, APP-006.

The Control Operator on duty on July 23, 1992, had received, acknowledged, and communicated the receipt of the CST high level alarm to the Makeup Water Treatment (MWT) operator who was controlling the filling of the CST. However, the Control Operator failed to communicate that the APP requires securing makeup to the CST upon receipt of this alarm. The MWT operator subsequently throttled CST makeup flow versus stopping flow; this was done to allow a temporary, truck-mounted makeup water treatment system to remain in service until the contract operator of this system could arrive at the site and secure the system. As such, there was a failure to comply with the specific procedural requirements associated with APP-006-E7.

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

In order to formally review this event and develop appropriate root cause and corrective actions, Adverse Condition Report (ACR) No. 92-301 was initiated. This ACR is intended to provide a documented review and evaluation of this event.

As an interim corrective measure, this event has been discussed with each Shift Supervisor and operating shift by the Manager - Operations to reinforce his expectations in the areas of annunciator response and procedure compliance. These discussions have resulted in a heightened sensitivity to proper annunciator response and procedural compliance in general.

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

In order to help ensure proper operator response to annunciators, interim guidance was issued prescribing the actions to be taken when annunciator response procedures do not provide guidance which will be effective in eliminating the diagnosed cause of the annunciator. This guidance has been formally incorporated into plant procedures by Revision 32 to OMM-001, "Operations - Conduct of Operations," which was approved and made effective on September 18, 1992. This revision incorporated a new section into OMM-001 which provides Annunciator Panel Procedure guidelines. This guidance is summarized as follows:

- If an expected alarm is received during performance of an approved plant procedure, the actions stated in the APP are not required to be performed.
- If an unexpected alarm is received, the APP shall be reviewed to diagnose which of the causes initiated the alarm condition and which action steps will correct the condition. Only the steps that apply to the identified cause are required to be performed.
- Plant operators are considered responsible for reviewing the APP for applicability when an alarm is received. When diagnosis of the alarm concludes that the actions listed in the APP are not appropriate, the existing plant conditions, diagnosis conclusions, and actions taken shall be logged.
- Plant conditions may require the implementation of a procedure that is of higher priority than the APP. In this case, the higher priority procedure may take precedence over the APP, thereby delaying review and implementation of the APP actions. However, it is expected that the appropriate APP actions will be reviewed and the required actions taken for each annunciator when plant conditions permit.

This guidance is expected to strengthen and improve operator response to annunciators.

In addition, Shift Supervisors have been directed to review this event with their shift members and solicit input for the development of an action plan to improve the quality of procedural compliance and annunciator response. Input from the operating shifts will be assembled and reviewed to support the development and issuance of permanent guidelines and expectations for annunciator response and procedural compliance.

4. The Date When Full Compliance Will Be Achieved

As stated above, a procedure revision to OMM-001 was made effective on September 18 which provides guidance regarding the actions to be taken in response to annunciators.

The process of development and issuance of the action plan for improving annunciator response and procedural compliance will be complete by March 30, 1993.

Finally, review and evaluation of this event under ACR No. 92-301 will provide the formally documented root cause evaluation and corrective actions to address this event.