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ACCESSION NBR: 9307070178 DOC. DATE: 93/07/01 NOTARIZED: NO DOCKET #
 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 DIETZ, C.R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in insp rept
 50-261/93-10.C/As: revised special procedure now contains
 steps to verify function of output contacts.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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Carolina Power & Light Company

ROBINSON NUCLEAR PLANT
POST OFFICE BOX 790
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JUL 01 1993

Robinson File No.: 13510E

Serial: RNP/93-1488

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. 50-261/93-10 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in NRC Inspection Report 50-261/93-10.

Enclosure 1 provides a description of the occurrence, the causal factors and root causes identified for the violation, and a discussion of the corrective actions taken and planned for the occurrence.

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 Plant

DHB:lst

Enclosure

cc: Mr. S. D. Ebnetter
Mr. W. T. Orders
INPO

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PDR ADOCK 05000261
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REPLY TO A NOTICE OF VIOLATION

RII-93-10-01

10 CFR 50 Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented procedures of a type appropriate to the circumstances. SP-1198 was established on April 10, 1993, to verify that AMSAC was operational after repairs had been performed on the system. AMSAC was installed to meet the risk reduction requirements of 10 CFR 50.62.

Contrary to the above, activities affecting quality were not prescribed by procedures appropriate to the circumstances, in that, SP-1198 failed to provide instructions to verify proper operation of the microprocessor used to repair "A" channel of AMSAC. On April 23, 1993, subsequent testing verified that the microprocessor installed in the "A" channel was operating properly.

REPLY

1. The Reason for the Violation

As stated in the report, both channels of AMSAC were lost on March 31, 1993. Spare parts for only one (1) channel were available at the time and were installed by Maintenance. The existing Maintenance procedure for returning AMSAC to service was based on restoration of the system with both channels intact. The AMSAC System Engineer was requested to prepare a Special Procedure to allow the single channel to be returned to service. The existing Maintenance procedure was used as the basis to develop the Special Procedure. At that time, the System Engineer was not aware that self-checks performed by the AMSAC System when both channels are intact do not occur when only one (1) channel is active. These self-checks are not mentioned in the existing procedure and are transparent when the system is tested normally unless the test fails, whereupon a logic failure would occur and alarm. The self-checks validate the actual trip contacts function.

The Special Procedure, as written, did not contain verification that the output contacts function properly. The Special Procedure was assigned to various individuals to perform reviews, but the individual most qualified to perform the technical review of the Special Procedure was unavailable. The Manager - Electrical Systems was aware of the need to return the system to service, and made the decision to have the Special Procedure reviewed by another individual. The lack of verification of output contacts function was not detected during the review, and the Special Procedure was approved and performed lacking the required verification.

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

The Special Procedure was revised and performed in its revised format. The revised Special Procedure verified the function of the output contacts.

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

The revised Special Procedure now contains steps to verify the function of the output contacts.

In addition, the Manager - Electrical Systems was counseled on the importance of assuring qualified individuals are utilized to review procedures.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

OUTGOING NRC CORRESPONDENCE INPUT VERIFICATION

JUL 1991 REV 3

FACTS #: 93R0105
LETTER #: _____

DOCUMENT IDENTIFICATION: RESPONSE TO NOTICE OF VIOLATION 93-10-00
HMSAC TESTING

INPUT VERIFICATION: For items 1-5 below, attachments to, or notes on the reverse of this page, are acceptable to ensure completeness.

THE ACCURACY OF THE ATTACHED INPUT WAS VERIFIED BY ONE OR MORE OF THE FOLLOWING METHOD(S) [SEE NOTE 1]:

PACKAGE PREPARER
(NOTE 1)

1. PERSONAL KNOWLEDGE OF SUBJECT/PROJECT

2. INPUT OBTAINED FROM OTHERS (LIST SOURCES.)

Name A. McCauley Organization TS

Name _____ Organization T

[Signature]

3. REVIEW OF PLANT TECHNICAL DOCUMENTS
(LIST DOCUMENTS) _____

4. VERIFIED BY FIELD OBSERVATIONS
(DISCUSS EXTENT) _____

5. OTHER (DESCRIBE): _____

COMMITMENT ID FORM (NG-5021) NA Attached
FSAR CHANGE FORM (NG-5024) DA Attached

☒ No Commitments
☒ No FSAR Changes (NOTE 2)

RESPONSE MANAGER (See NOTE 1)	DATE
<u>Anthony P. Cleary</u>	<u>22 JUN 93</u>

NOTE 1: Each individual, by his signature, attests that to the best of his knowledge and based on personal knowledge, reports from cognizant individuals, or reference to appropriate documentation that the input provided is accurate and free from material false statement.

NOTE 2: 10CFR50.71(e) requires that the FSAR(s) be revised "to contain all the changes necessary to reflect information and analyses submitted to the Commission."

JUL 1951 REV 3

FACTS #: _____
LETTER #: _____

[illegible]

DATE: _____

NOTE 1: Include information such as what commitment is contingent upon, why commitment is being made, or other information to assist Senior Management in the decision and sign-out approval process.