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SUBJECT: Responds to violations noted in Insp Rept 50-261/93-21.
Corrective actions: mgt expectations w/respect to procedure
usage & adherence evaluated, Adverse Condition Rept 93-173
initiated & Procedure CM-603 revised.

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DEC 08 1993

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
NRC INSPECTION NO. 50-261/93-21:REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notices of Violation identified in NRC Inspection Report 50-261/93-21.

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

Should you have any questions regarding this matter, please contact Mr. D. B. Waters at (803) 383-1802.

Very truly yours,

Charles R. Dietz
Vice President
Robinson Nuclear Plant

RDC:lkg
Enclosure

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IEO/
1/1

Enclosure

REPLY TO A NOTICE OF VIOLATION

RII-93-21-02:

Technical Specification 6.5.1.1, Procedures, Tests, and Experiments, requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, 1978. Paragraph 4 of Appendix A requires instructions for operation of onsite electrical systems. Also paragraph 9 of Appendix A requires that maintenance be performed in accordance with written procedures.

Operating Procedure, OP-603, Electrical Distribution, provides the instructions for operations of onsite electrical systems.

Special Procedure, SP-1231, Steam Generator Sludge Lance Inspection, provides the instructions for conducting sludge lancing of steam generator secondary sides.

Contrary to the above;

1. On September 19, 1993, an operator deviated from OP-603 while transferring service water pump D from normal to emergency power. As a result of this deviation, the power was lost to motor control center MCC-5.
2. On September 21, 1993, a vent path to atmosphere was not identified and caution tagged as required by SP-1231. As a result, a vent valve on the sludge lancing rig was open and a vent path from containment existed.

REPLY

CP&L acknowledges that the violations occurred as described. CP&L recognizes a continuing trend of procedural noncompliance occurrences. As such, the following reply addresses actions taken and planned to correct this recurring problem.

1. The Reason for the Violation

The examples provided involve two separate and unrelated occurrences. Similar examples were identified by the NRC in Inspection Reports 93-11 and 93-18. In response to these violations (RNP/93-1756, August 2, 1993 and RNP/93-2535, October 11, 1993) CP&L identified causal factors to be deficiencies in human performance, procedure adherence, and personnel accountability. These causal factors continue to exist. While the evaluation of each specific occurrence is being addressed through the Corrective Action Program (ACR 93-182, ACR 93-362), this response addresses the management issues common to each example.

Both of the examples cited are attributed to personnel error and a failure to comply with procedures. With regard to the operator deviation from OP-603, a lack of attention to detail and failure to apply adequate focus on self checking practices are considered as primary causal factors. A similar concern was identified by the NRC in Inspection Report 93-19, where an Operator inadvertently positioned an incorrect switch, resulting in a turbine runback. The primary causal factor for the failure to identify the vent path to atmosphere for the sludge lance equipment concerns a procedural inadequacy in that the authors and reviewers of Special Procedure SP-1231 failed to include specific instructions to ensure the valves were in their required position prior to tagging equipment in the sludge lance trailer.

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

Corrective steps continue to be taken to improve procedure adherence and to raise standards with regard to overall personnel expectations and performance. In response to a Nuclear Assessment Department assessment of the Robinson procedures program conducted during June, 1993, management expectations with respect to procedure usage and adherence have been evaluated, and procedure use and expectations are being incorporated into Administrative procedures. Operations management continues to pursue the corrective action plan submitted in response to the violation issued in NRC Inspection Report 93-11-02, recognizing that these actions were initially formulated in response to a prior violation (92-22-01, dated August 21, 1992), which involved the failure to properly implement Annunciator Panel procedures.

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

As previously committed in response to violation 93-11-02 and 93-18-01, the implementation of the corrective action plan to address the issues of procedure usage will continue, but will be expanded to include all functions responsible for overall facility operation. These actions will address issues of procedure usage, appropriate response to procedure/equipment problems, how appropriate responses may vary based upon plant condition or the potential for equipment damage/personnel injury, and troubleshooting equipment problems during the performance of a procedure versus with no procedure guidance in effect.

This effort will result in the development of new or otherwise enhanced guidance which will be procedurally provided to all personnel involved in facility operation.

In addition, Plant Unit Managers will discuss with their personnel the issues identified as part of the above-described corrective action. This session will include a two-way discussion, including examples of procedural compliance issues solicited in advance from various resources. Consideration will be given to the utilization of case studies in which personnel will be asked how they would respond to certain situations. The proposed responses will then be compared to management expectations for the activity. The intent of this exercise will be the development of a more unified understanding among plant personnel regarding implementation of management directives and expectations.

As a result of recent plant activities, a "Plan for Restart Readiness and Startup and Power Ascension" was developed and incorporated into the Plant Operating Manual as procedure PLP-059. This is a self-assessment plan which includes management Performance Objectives to confirm that plant equipment and systems, management processes, and plant personnel are in a state of readiness to support safe and reliable startup and power operation of Robinson Unit 2. "Assessment Hold-Points" have been established in this procedure to support start-up activities, two of which are applicable to this violation. They are 1) Maintenance, Technical Support, and E&RC procedures provide appropriate direction and effectively support the safe and reliable operation of the plant, and 2) Management policies, actions, and personnel performance ensure that personnel and reactor safety and the foremost in plant operations. These hold-points are to be implemented at predetermined stopping points, where plant evolutions cease until approved by the Vice President, Robinson Nuclear Plant for continuance of the planned activity.

4. The Date When Full Compliance Will Be Achieved

As stated in response to NRC violation 93-11-02, activities for the Operations staff will be complete by April 6, 1994. The Maintenance, Technical Support, and Environmental and Radiation Control Units will complete the above activities by June 30, 1994.

RII-93-21-04:

Technical Specification 3.8.1., requires that the equipment hatch be "properly closed" during refueling operations. Implicit in this requirement is the requisite that the hatch be capable of performing its intended safety function, which in this case, is to prevent the release of radioactive material to the environment in the event of a fuel handling accident or a prolonged loss of core cooling.

Technical Specification 6.5.1.1, Procedures, Tests, and Experiments, requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, 1978. Appendix A, Section 3.(f)1 requires instructions for maintaining containment integrity. Implicit in this requirement are the requisites that the procedures be adequate to facilitate the applicable evolution and that personnel use the procedures during the performance of the evolution.

Operations Management Manual, OMM-33, Implementation of Containment Vessel Closure provides instructions for installing the equipment hatch to support refueling operations.

Contrary to the above, on September 23, 1993, the licensee did not use a procedure to facilitate the re-installation of the containment building equipment hatch when they were preparing for refueling operations. This resulted in the inadequate installation of the equipment hatch which in turn allowed in the execution of refueling operations without having established containment integrity.

REPLY

CP&L acknowledges that the violation occurred as described.

1. The Reason for the Violation

This violation is attributed to the lack of adequate procedural controls for interim installation of the equipment hatch during an outage, and the lack of a basis for the limitations of pressure requirements associated with Containment closure. Procedure OMM-033, which provides guidance for installation of the hatch for Containment Closure/Refueling Integrity did not provide hatch bolt torque and sequence necessary for hatch sealing. Although OMM-033 was not directly utilized for the interim installation, the hatch had been installed snug tight with the understanding that should Containment Closure be required, tightening the hatch bolts to withstand 19 psia would occur. Causal factors contributing to this event include numerous procedures and other documents that provide definitions of containment integrity and installation and reinstallation instructions.

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

Adverse Condition Report 93-173 was initiated to document this condition and to facilitate a root cause investigation. The evaluation was completed on October 25, 1993.

Procedure CM-603 was revised to ensure proper installation during any plant modes requiring containment or refueling integrity. Engineering Evaluation 93-140 was written to address torque values and sequencing requirements.

In order to address the Equipment Hatch bolt torquing requirements necessary to meet the closure requirements for operational modes specified in the Technical Specifications (refueling and full Containment Integrity), as well as for to meet the containment closure requirements as recommended by NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management", flange-to-gap measurements were obtained to ensure an adequate seal is provided for each applicable mode.

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

Plant Procedure PLP-059, "Plan for Restart Readiness and Startup and Power Ascension" will be used to verify that Plant procedures provide appropriate direction and effectively support the safe and reliable operation of the plant, and that Management policies, actions, and personnel performance ensure that personnel and reactor safety are the foremost in plant operations.

4. The Date When Full Compliance Will Be Achieved

The Self assessment activities provided in PLP-059 will be completed prior to return to service from the current outage.