

EXPEDITED
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9407070050 DOC. DATE: 94/06/29 NOTARIZED: NO DOCKET #
FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co. 05000261
AUTH. NAME AUTHOR AFFILIATION
HINNANT, C.S. Carolina Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940530 ltr re violations noted in insp rept
50-261/94-13. Corrective actions: formal process for turnover
within shift will be established.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-1 PD	1 1	MOZAFARI, B	1 1
INTERNAL:	AEOD/DEIB	1 1	AEOD/DSP/ROAB	1 1
	AEOD/DSP/TPAB	1 1	AEOD/TTC	1 1
	DEDRO	1 1	NRR/DORS/OEAB	1 1
	NRR/DRCH/HHFB	1 1	NRR/PMAS/ILPB1	1 1
	NRR/PMAS/IRCB-E	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS3	1 1
	REG FILE 02	1 1	RES/HFB	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. 504-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 20 ENCL 20

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T



10 CFR 2.201

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

Robinson File No.: 13510E
Serial: RNP/94-1277

JUN 29 1994

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/94-13
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

This provides the Carolina Power & Light Company reply to the Notice of Violation identified in NRC Inspection Report 50-261/94-13, which was transmitted by letter dated May 30, 1994. The Violation involves the failure to maintain a licensed control operator or senior reactor operator present at the controls area during operation of the facility.

As requested in the letter transmitting the Notice of Violation, the enclosure restates the violation, followed by our reply.

Should you have any questions regarding this matter, please contact Mr. R. M. Krich at (803) 383-1802.

Very truly yours,

C. S. Hinnant
Vice President

DTG:dwm

Enclosure

c: Mr. S. D. Ebnetter, Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

9407070050 940629
PDR ADDCK 05000261
PDR

Highway 151 and SC 23 Hartsville SC

IE01
11

REPLY TO A NOTICE OF VIOLATION

Violation 94-13-01

10 CFR 50.54 (k) requires that an operator or senior operator, licensed pursuant to Part 55 of 10 CFR, shall be present at the controls at all times during the operation of the facility.

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 2.g of that Appendix specifies that reactor operation and process monitoring be performed in accordance with written procedures.

Operations Management Manual Procedure OMM-001, Operations-Conduct of Operations, requires in part, that the control operator on duty must remain within the area inside the control room defined by "...the walled partition, 230 kV line panel and the black stripes bordering the control room carpet."

Contrary to the above, on the afternoon of April 22, 1994, with the unit operating at 100% power, an operator (control operator on duty) was not present at the controls area as described in Operations Management Manual Procedure OMM-001, Operations-Conduct of Operations, for a short duration of time.

Reply

Carolina Power & Light (CP&L) agrees that the violation occurred as described.

1. The Reason for the Violation

This violation was caused by inadequate self-checking and attention to detail by the Balance of Plant (BOP) operator. A contributing cause was a less than adequate turnover between the BOP operator and the Control Operator (CO) upon the CO exiting to the control room kitchen facility. The BOP operator inadvertently exited the "at the controls" area by passing through a glass partition door and stepping out across the passageway to the Shift Supervisor's office, approximately five (5) feet in distance. The Shift Technical Advisor immediately realized the mistake and reminded the BOP operator that there was no CO at the watch station. The BOP operator immediately returned to the controls area within approximately 5 - 10 seconds of exiting.

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

The Operations Manager was immediately notified of the occurrence, and he issued a memo to all licensed personnel, describing the circumstances and consequences of the event, the watch standing procedural requirements, and management expectations with respect to this event.

The BOP operator was counselled by operations management and given the opportunity to present the sequence of events at the May 16, 1994, NRC Enforcement Conference.

Operations performed a self-assessment of past Operations caused adverse conditions/events. The team was composed of the operating crew involved in the event with the assistance of the Human Performance Enhancement System Coordinator.

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

A formal process for turnover within the shift will be established. This event was reviewed with Operations personnel to ensure they clearly understand that there is a need for continuous control and monitoring of the Reactor Turbine Generator Board at all times, and also to ensure that a Senior Reactor Operator remains in the control room at all times.

The need and expectation for formal performance of duties at all times, including when the operators are in the Training Simulator, has been reinforced to Operations personnel. Operations Management also reinforced the need to monitor and emphasize this expectation in the simulator environment to the Licensed Operator Training Unit. This will ensure that the conduct of temporary relief is performed during training in the same manner that is expected in the control room.

There will be periodic crew assessment/realignment to reduce complacency and improve the knowledge and abilities of the operating crews.

In addition, corrective actions presented at the May 16, 1994, NRC Enforcement Conference will continue to be implemented to address the broader issue of operations performance.

4. The Date When Full Compliance Will Be Achieved

Full compliance for the specific corrective actions identified above will be achieved by July 15, 1994.