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SUBJECT: Responds to NRC 940815 ltr re violations noted in insp rept
 50-261/94-17. Corrective actions: LCTR was removed from
 "B" PACV filter dampers & placed back into svc until planned
 maintenance.

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Robinson File No.: 13510E
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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. 50-261/94-17
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 50-261/94-17, which was transmitted by letter dated August 15, 1994. The Notice of Violation involves inadequate procedures governing equipment control, the failure to correct improperly routed instrument sensing lines, and the failure to include wide range penetration pressurization system flow meters in a calibration program.

As requested in the letter transmitting the Notice of Violation, the enclosure restates each 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

C. S. Hinnant
Vice President

100045

DTG:klg
Enclosures

- c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
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REPLY TO A NOTICE OF VIOLATION

Violation A

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, that these instructions, procedures or drawings include appropriate acceptance criteria, and that the activities be performed in accordance with these instructions, procedures, or drawings.

Contrary to the above, procedural guidance for the removal of Technical Specification (TS) required equipment, that does not have a TS action statement, is inadequate, in that on May 31, 1994, the resident inspectors identified that the train "B" inlet and outlet filter dampers for the Post Accident Containment Venting System were tagged shut with no limit on the time the equipment could remain out of service. This equipment is required during post-accident conditions and an operator could have received 150 mRem to restore the system during an accident condition.

Reply

Carolina Power & Light (CP&L) denies the violation.

1. The Basis for Disputing the Violation

The Notice of Violation references 10 CFR 50, Appendix B, Criterion V, as the regulatory requirement that is not met. Contrary to the Notice of Violation, CP&L does indeed provide procedural guidance to the operators for evaluating and removing a piece of equipment from service if that piece of equipment does not have a specific TS action statement associated with its removal. This guidance exists as part of the Work Control Process and Clearance Procedure, and meets all applicable requirements from 10 CFR 50, Appendix B, Criterion V.

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, NRC approved Quality Assurance (QA) Program in the Updated Final Safety Analysis Report (UFSAR), Section 17.2.5, addresses 10 CFR 50, Appendix B, Criterion V, by establishing the requirements for prescribing and accomplishing activities affecting quality in accordance with instructions, procedures, and/or drawings. Section 6.2.3 of the Corporate Quality Assurance Manual, which implements the QA Program, states that the accomplishment of activities affecting quality shall be in accordance with approved procedures and/or drawings which are appropriate to the circumstances.

Compliance with the requirements of 10 CFR 50, Appendix B, Criterion V as delineated in the QA Program is further described in the HBRSEP UFSAR, Section 1.8, which states that CP&L conforms to Regulatory Guide (RG) 1.33, Revision 2, February 1978, and the recommendations for administrative controls described in ANSI N18.7-1976 with certain exceptions not relevant to 10 CFR 50, Appendix B, Criterion V. Technical Specifications (TS) Section 6.5.1.1 also requires that the written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of RG 1.33, Revision 2, February 1978. This RG endorses, with certain clarifications, ANSI N18.7-1976. RG 1.33, Appendix A, Item 1.c specifies administrative procedures for equipment control and Item 9.e(1) specifies a method for obtaining permission and clearance from operations personnel to work on equipment and for logging such work. ANSI N18.7-1976, Section 5.2.6, states that permission to release equipment or systems for maintenance shall be granted by designated operating personnel and that prior to granting such permission, operations personnel shall verify that the equipment or system can be released, and determine how long it may be out of service.

Plant Program Procedure PLP-056, "Work Control Process," in conjunction with Operations Management Manual OMM-005, "Local Clearance and Test Request," implements the provisions of the ANSI standard in this regard. PLP-056, step 5.2.3, states that if operability or reliability of safety-related equipment is affected, the Work Control Center Senior Reactor Operator (SRO) shall immediately notify the Shift Supervisor and prepare a Equipment Inoperable Record (EIR) if required. PLP-056, step 5.2.5, states that during the initial review of the work request, the Work Control Center SRO shall assign the appropriate priority code (i.e., Codes E,1,2,3,4) in accordance with Attachment 6.9, "Work Control Priority System." PLP-056, Attachment 6.9, has two priority categories that may apply to maintenance of equipment that is not covered by a TS Limiting Condition for Operation (LCO). Priority 2 applies to emergent repairs that have a reasonable probability of effecting safe, economical, reliable, and environmentally sound power generation. Priority 3 applies to routine repairs that do not directly have a significant impact on safe, economic, reliable, and environmentally sound power generation. This prioritization is intended to satisfy, in part, the provision in Section 5.2.6 of ANSI N18.7-1976 concerning the determination of how long equipment may be out of service.

All work performed is controlled in accordance with PLP-056, which establishes priority for the work. While the TS LCO action times are taken into account in Attachment 6.9, the assignment of priority for maintenance work is not limited to equipment covered in TS. The prioritization of maintenance activities is only broadly based on TS action statement time restrictions. The Post Accident Containment Venting (PACV) filters involved are not covered by TS.

OMM-005 step 6.2.1.2 requires that an operator determine the proper sequence for hanging tags, taking into account plant conditions, equipment configuration and purpose of clearance. OMM-005 step 6.2.1.4.6 requires that a licensed operator perform a second check of the Component Identification Sheet for equipment clearances developed by the original operator, and step 6.2.1.4.7 requires that permission for clearances be obtained from the licensed Shift Supervisor. These checks in conjunction with the evaluation of work priority assure that the appropriate procedural guidance is adhered to for removal of all equipment regardless of whether the equipment is contained in TS.

The cause of the condition resulting in the NRC Notice of Violation was a lack of consistency in controlling the removal of equipment from service when the equipment is not contained in a specific TS LCO. Two systems, Anticipated Transient Without Scram Mitigation System Actuation Circuitry (AMSAC) and the PACV, were cited in the Inspection Report as lacking the procedural controls of an associated Operations Work Procedure (OWP) in accordance with Operations Management Manual OMM-004, "Operations Work Procedure," as well as the controls on out of service time applied by the EIR process, required by Operations Management Manual OMM-007, "Equipment Inoperable Record." On the contrary, certain types of equipment which do not have a specific LCO in the TS, e.g., Fire Protection and Dedicated Shutdown equipment, do have an associated EIR and/or OWP in accordance with OMM-007, and OMM-004, respectively.

The specific incident referenced in the Inspection Report involved removal of the PACV system train "B" filters from service for scheduled maintenance to replace the filter housing door seals. The filter housing for the "B" train is removed by closing the inlet and outlet dampers downstream of containment isolation valves, and the hydrogen recombiner outlet to containment. The closure of these dampers would not interfere with operation of the hydrogen recombiner. Containment venting was also available via the "A" train. A Local Clearance and Test Request (LCTR) was hung on the dampers to support scheduled maintenance that was subsequently delayed. A delay then occurred between the time that the LCTR was hung and the time that the LCTR was to be accepted by Maintenance to perform work.

The UFSAR, Section 6.2.5.3, allows 54 days to place the PACV or hydrogen recombiner into service following a Loss of Coolant Accident. The Basis for TS Section 3.3.5, "Post Accident Containment Venting System," states that testing of the Air Supply system to the PACV containment isolation valves is not required because of the long lead time available to perform maintenance between the time of the accident and the time when operation of the PACV is needed. This is consistent with the UFSAR in that the potential need to perform post accident maintenance of the PACV was considered in the licensing basis. Since only a LCTR affected this system during the period of time in question (i.e., there were no physical restrictions to restoring these dampers to the open condition), and maintenance was scheduled in accordance with the PLP-056 priority system, the PACV could have been quickly restored to service post accident. Specifically, a dose of 150 mRem has been estimated to be received by a worker assigned to restore the PACV dampers to service post accident. This is less than 1% of the allowable Emergency Worker Dose for taking actions to avoid dose to the public. The removal of the PACV train "B" filters from service remained under administrative controls at all times.

However, improvements to the procedural controls for removing certain equipment have been identified as described below.

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

The LCTR was removed from the "B" PACV filter dampers and placed back into service until the planned maintenance (i.e., filter housing seal replacement) could be promptly performed by Maintenance personnel.

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

A mechanism to consistently control out of service time of equipment which is important to safety (i.e., as described below) that is not associated with a TS LCO will be implemented.

A review will be conducted of the Emergency Operating Procedures, Abnormal Operating Procedures, and the UFSAR for equipment which affects the ability to perform actions following an accident, or has other quality or safety significance. Identified equipment will be added to the mechanism to control out of service periods.

A mechanism will be implemented to identify LCTRs that have been initiated to place equipment out of service for which maintenance has not begun after an appropriate time.

4. The Date When Full Compliance Will Be Achieved

The improvements described above will be achieved with the above corrective actions by November 6, 1994.

Violation B

10 CFR 50, Appendix B, Criterion XVI requires, in part, that measures be established to ensure that conditions adverse to quality are promptly identified and corrected, including corrective action to preclude repetition of significant conditions adverse to quality.

Contrary to the above, the licensee failed to take corrective action for repetitive failures of Flow Indicator, FI-605, Residual Heat Removal Total Flow, between May 18, 1991, and July 1, 1994.

Reply

CP&L agrees that the violation occurred as described.

1. The Reason for the Violation

The cause for this violation was due to a failure to apply the appropriate level of attention to this condition and failure to recognize the condition as a repetitive failure.

In November 1993, an Adverse Condition Report (ACR) was initiated for a repeat problem with flow oscillation associated with Flow Indicator (FI) FI-605, which measures Residual Heat Removal (RHR) system total flow. The corrective action identified by this ACR was to re-route the improperly sloped sensing lines for the associated flow transmitter. This corrective action was not implemented in a timely manner to preclude repetition of FI-605 failures. The corrective action was closed by initiation of a maintenance work request. Since this problem was not recognized as a recurring condition, the work request was assigned a low priority, therefore the maintenance work was not scheduled to be performed in a timely manner allowing recurrence of the problem. The tracking of the work request outside of the ACR corrective action program prevented appropriate management oversight.

The work request associated with FI-605 did not meet the screening criteria of the Repetitive Failure Program (RFP) in use prior to April 1994 to identify repeat equipment problems. The RFP screening criteria are: 1) identical equipment codes, 2) similar problem description and corrective action, and 3) an event repeat within 18 months. The same problem was identified in the Automated Maintenance Management System on previous occasions, but was not recognized by the RFP because some of these work requests were for the flow indicator and some were for the flow transmitter. Also, there were differences between problem descriptions and corrective actions which placed them outside the RFP criteria described above. In April 1994, when an RFP report identified FI-605 as a repetitive problem, the report was dispositioned by noting that a work request already existed that would resolve the problem.

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

Administratively controlled Operator Aids were developed and issued to provide an alternate means of determining RHR flow in lieu of FI-605 indication until the instrument tubing could be re-sloped.

The improperly routed instrument sensing lines were re-sloped in accordance with the transmitter manufacturer's recommendations.

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

The Corrective Action Program now prohibits closure of Level I and II ACR corrective actions by the initiation of another tracking process. The corrective actions are now required to be implemented in order to close a corrective action in the tracking system.

Other transmitters will be reviewed to identify any sensing lines that may be improperly sloped and appropriate corrective actions will be initiated.

The RFP will be converted from a guideline to a Plant Program procedure. The Plant Program procedure will include a clearer delineation of responsibilities, a feedback mechanism, an expanded sample period beyond the current 18 months, identification of components by model number, and other enhancements that will become necessary in order to comply with the Maintenance Rule.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the completion of the above corrective actions by November 16, 1994.

Violation C

10 CFR 50, Appendix B, Criterion XII, requires that measures be established to assure that instruments used in activities affecting quality are properly controlled and calibrated.

Contrary to the above, on June 23, 1994, the Penetration Pressurization System wide range flow meters were not included in the licensee's calibration program. At the time of this observation, the C train penetration pressurization system flow rate was being monitored by the wide range instrument.

Reply

CP&L agrees that the violation occurred as described.

1. The Reason for the Violation

A modification to the Penetration Pressurization System (PPS) failed to identify and specify the requirement to add the PPS wide range flow meters to the calibration program. During the modification process, neither the Corporate Quality Assurance Program or 10 CFR 50 Appendix B requirements were reviewed for applicable codes and standards. The modification deficiency was due to a personnel error caused by inattention to detail and insufficient training to determine and consider applicable codes and standards.

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

Disciplinary action was taken with the appropriate individuals involved with this event.

The PPS wide range flow meters were replaced with in-stock calibrated flow meters and these flow meters will be included in the calibration program by adding them to the Maintenance Management Manual Procedure, MMM-006, "Calibration Instrument List."

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

As an enhancement, the Modification and Design Control Procedure, MOD-010, "Design Verification and Technical Review," will be revised to ensure a review of the applicable sections of the Corporate Quality Assurance Program Manual so that modifications or Engineering Evaluations identify instruments that should be included in the calibration program.

This event will be reviewed with Design Engineering within Robinson Engineering Support Section personnel in conjunction with the revision of MOD-010.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with completion of the above corrective actions by October 18, 1994.