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SUBJECT: Provides response to violations noted in Insp Rept
50-261/94-300. Corrective actions: individual counselled &
restricted from shift responsibilities pending proper
reactivation, upon identification of situation.

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10 CFR 2.201

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551
Robinson File No.: 13510E
Serial: RNP/94-1814

OCT 17 1994

United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
NRC EXAMINATION REPORT NO. 50-261/94-300
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

This provides the Carolina Power & Light (CP&L) Company reply to the Notice of Violation identified in NRC Examination Report 50-261/94-300, which was transmitted by letter dated August 26, 1994. The Notice of Violation involves the failure to assure that the qualifications and status of reactor operators are current and valid prior to assumption of licensed functions.

As requested in the letter transmitting the Notice of Violation, the enclosure restates the violation, followed by our reply. This reply also provides the broad corrective actions we are taking to assure that programmatic concerns in the areas of operator performance, training, and procedure development and control are adequately addressed. As documented in our letter dated September 23, 1994, this response is being submitted two weeks later than the requested due date.

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

240000

RDC:rdc
Enclosure

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

Violation 94-300-04

10 CFR 50.54(i) states in part:

"...the licensee may not permit the manipulation of the controls of any facility by anyone who is not a licensed operator or senior operator as provided in part 55 of this chapter."

10 CFR 55.53(e) states in part:

"If a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section."

10 CFR 55.53(f)(2) states, in part, the requirements for activating an inactive license:

"The licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned. The 40 hours must have included a complete tour of the plant and all required shift turnover procedures."

Contrary to the above, on June 23, 1994, July 12, 1994, and April 22, 1994, the facility licensee failed to ensure that personnel operating the controls of the facility had properly reactivated their Part 55 license. Three cases were identified in which the Part 55 license holder failed to make a complete tour of the plant under the direction of an active operator or senior operator before the license was certified "active" by facility management.

Records of the three inactive license holder's activities during the 40 hour reactivation period indicated that the three individuals conducted their tours without the direction of an active operator or senior operator with the result that vital equipment areas such as the Boron Injection Tank (BIT) room, Auxiliary Feedwater (AFW) room, Vital 4160 volt switch gear room, control room Heating, Ventilation and Air Conditioning (HVAC), and the Spent Fuel Pool were not toured by two of the three inactive license holders.

Reply

Carolina Power & Light agrees with the violation; however, the results of our evaluation demonstrate that all three individuals were under the direction of an active operator or senior operator as required by 10 CFR 55.53(f)(2). Also, complete plant tours were conducted by two of the individuals; the third individual did not perform a complete plant tour as required. Therefore, this reply addresses the circumstances surrounding the failure of one operator to properly reactivate his license.

1. The Reason for the Violation

This violation was caused by a lack of written guidance delineating the plant tour requirements for reactivation of operator licenses, and utilization of poor judgement on the part of the individual involved. The requirement for performing a "complete tour of the plant" was informally interpreted by the individual involved as requiring a tour of areas not recently entered, to identify equipment conditions which may have changed since their latest entry into an area. However, the Acting Operations Manager determined that the extent of the tour by the individual involved was neither of sufficient duration nor thorough enough, for him to have become familiar with plant conditions which may have changed.

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

Upon identification of this situation, the individual was counselled and was restricted from his shift responsibilities pending proper reactivation. The Acting Operations Manager also issued a Night Order providing temporary guidelines for conducting complete plant tours during the reactivation of licensed operators. Although the individual did not fully meet the requirement of 10 CFR 55.53(f), he did maintain his Licensed Operator Requalification training current by attending scheduled training sessions and completing 40 hours of shift functions under the direction of a Shift Supervisor. A review was conducted of security access data for all individuals reactivated during 1994; no other instances of inadequate plant tours were identified.

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

Operations Management Manual procedure, OMM-037, "Operator Watchstanding Status and Reactivation Requirements," which delineates the requirements for a "complete tour of the plant," has been developed and implemented. This procedure requires a tour of all plant areas normally accessible to personnel, and is designed to ensure license reactivation includes a thorough familiarization of equipment conditions and any plant changes that have occurred.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

The following information is being provided, to address the broad corrective actions we are taking in the areas of operator performance, training, and procedure development and control, as requested in the cover letter transmitting the examination report. This information was discussed with the NRC during the Near Term Improvement Plan (NTIP) Summary and Management Meeting, which was held on October 12, 1994, at the plant site. During this meeting, the Plant General Manager and the Manager-Operations discussed their convictions, expectations, and actions regarding operator performance, effective utilization of the corrective action process, individual accountability, and teamwork. In addition, the Manager-Training provided his convictions and expectations of training support of operator performance, and discussed the specific corrective actions that have been and continue to be taken in support of improved operator performance.

During the last quarter of 1993, a comprehensive review of the training program was conducted. A self-assessment of Licensed Operator Requalification (LOR) training was performed, identifying that LOR training has not kept pace with changing industry standards. The initial operator training program also exhibited the same characteristics. During the last renewal of training program accreditation, our self-assessment process, as well as line and training management's involvement in training, was also identified to be weak.

In order to address the problems described above, management has developed increased standards and expectations for all aspects of training, resulting in the creation of several broad based initiatives to improve the training program. To support these initiatives, a new training management team has been established, a more rigorous operator qualification schedule has been developed, and the schedule and candidate selection criteria for initial operator training classes was revised.

Improvements are also underway with procedure development and control. The Abnormal Operating Procedure (AOP) and Emergency Operating Procedure (EOP) upgrade project has been completed, with the exceptions of setpoint document validation, and required training. Appropriate tool staging has been established during the validation of the AOPs and EOPs. The overall operations procedure change backlog is being reduced.

Through implementation of the NTIP, our management team is setting and communicating high standards. The results of these and other initiatives will demonstrate our commitment to improve operator performance, training, and procedure development and control.