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SUBJECT: Responds to NRC 950407 ltr re violations noted in insp rept
 50-261/95-08. Corrective actions: AOP-014 revised on 950310, to
 provide sufficient guidance for connecting cooling water to
 two pumps.

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10 CFR 2.201

Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 13510E

Serial: RNP-RA/95-0077

MAY 07 1995

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 INSPECTION REPORT NO. 50-261/95-08

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 Inspection Report 50-261/95-08, which was transmitted by letter dated April 7, 1994. The Notice of Violation involves an Abnormal Operating Procedure inadequacy. As requested in the letter transmitting the Notice of Violation, the enclosure restates the violation, followed by our reply.

In addition to the Notice of Violation reply, CP&L was requested to address how implementation of corporate procurement engineering procedures ensures site specific commitments and how interface processes are adequately maintained, and to address the potential for existence of a generic problem at the other CP&L nuclear sites.

On July 1, 1994, the functions of the site Procurement Engineering and Quality Control Receipt Inspection organizations were consolidated under the Materials and Contract Units, directed by the corporate Nuclear Procurement, Contracts, and Materials Management (NPCMM) Section. An interface agreement between the Vice President - Nuclear Engineering Department and the Manager - NPCMM for transition of the Procurement and Design Engineering and the materials acquisition processes, was published on June 30, 1994, and the interface agreement was distributed to the Vice Presidents of each of the CP&L nuclear sites. These documents describe the processes and procedural controls that govern the transition period.

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The NPCMM Section utilizes corporate Materials and Contract Services (MCS) procedures to describe the general processes and activities performed by MCS personnel. The regulatory requirements and commitments applicable to an MCS process are reflected in MCS procedures. Topical Instructions (TIs) are utilized to provide detailed guidance in the implementation of MCS procedure requirements as they apply to a specific topic (e.g., performing a commercial grade evaluation). Standing Orders (SOs) are issued by MCS management as a method to provide instructions of a short term or continuing applicability to the conduct of business. A Standing Order is not used for any situation that would require a 10 CFR 50.59 review.

Procedure MCS-05, "MCS Procedures Administration and Control," delineates the process to ensure that commitments and requirements are considered for MCS procedure changes. This procedure specifies that qualified individuals perform technical and 10 CFR 50.59 reviews of MCS procedure changes. This process is applicable to all CP&L nuclear sites. Therefore, the integrity of procedures that satisfy site-specific regulatory requirements and commitments is maintained by this review process.

A self-assessment of these site specific commitments has been conducted, and no commitments were found to have been inadvertently negated. Based on this self-assessment, we are satisfied that regulatory commitments specific to H. B. Robinson Steam Electric Plant continue to be maintained by the corporate program.

Should you have any questions regarding this matter, please contact Mr. R. M. Krich at (803) 857-1802.

Very truly yours,



C. S. Hinnant
Vice President

RDC:rdc
Enclosure

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

REPLY TO A NOTICE OF VIOLATION

Violation 95-08-01

Technical Specification 6.5.1.1 Procedures, Tests, and Experiments requires, in part, that written procedures shall be established, implemented, and maintained covering the activities referenced in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

Regulatory Guide 1.33, Appendix A, requires Procedures for Combating Emergencies and Other Significant Events, specifically Loss of Component Cooling System and Cooling to Individual Components.

Contrary to the above, the inspection conducted March 6-10, 1995, determined that Abnormal Operating Procedure AOP-014, Component Cooling Water System Malfunction, Revision 6, Attachment 1, Emergency Cooling to Charging Pumps, was inadequately maintained in that there was insufficient guidance for the connection of cooling water to two pumps. Additionally, the instructions for selection of a charging pump to be connected could not be performed as written.

Reply

Carolina Power & Light (CP&L) agrees that the violation occurred as described. A complete loss of Component Cooling Water is not a credible accident condition evaluated in the Updated Final Safety Analysis Report (UFSAR). However, adequate directions were not provided in Abnormal Operating Procedure (AOP)-014 (i.e., AOP-014), "Component Cooling Water System Malfunction," Attachment 1, "Emergency Cooling to Charging Pumps" to align emergency cooling to a charging pump in the event of such an occurrence. Nevertheless, as specified in AOP-014, Operations personnel would have continued alternating the operating charging pump(s) at five minute intervals to avoid damaging the operating charging pump(s). Thus, a delayed alignment of emergency cooling water would have resulted until Operations personnel determined the proper method for performing AOP-014. Therefore, no potential adverse safety significant condition with respect to the ability of the Charging System to perform a needed function existed as a result of the procedure deficiency. However, the procedure inadequacy is considered a serious concern.

1. The Reason for the Violation

This violation was the result of personnel error. A failure in the procedure revision Verification and Validation (V&V) process resulted in the procedure deficiency.

Prior to revision 6 to AOP-014, the procedure attachment for alignment of emergency cooling to the Charging Pumps was constructed in a single column format. Human factors concerns were identified regarding the complexity of the procedure steps and logical order of the steps (i.e., "IF/THEN" statements) that are normally created by this single column format. When the Emergency Operating Procedure/Abnormal Operating Procedure (EOP/AOP) Upgrade Project converted AOP-014 to a dual column format, this revision contained, in the main body of the procedure, a dual column header, "STEP, INSTRUCTIONS, RESPONSE NOT OBTAINED" (RNO), and transitional steps were placed in the RNO column. However, the column headings were not included at the top of the page of the attachment, and consequently, an incorrect transitional step for connecting the charging pump was included in this revision. Subsequent procedure reviews and V&Vs failed to detect this error.

Insufficient attention to detail was applied when the incorrect transitional step was included in the attachment, and when the procedure was validated in the field by an Auxiliary Operator (AO). Due to the lack of column headings on the attachment pages, and transitional step numbers in the RNO column, the AO treated those steps as single column format procedure when performing the V&V.

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

AOP-014, Attachment 1, was revised on March 10, 1995, to provide sufficient guidance for connecting cooling water to two pumps.

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

EOP and AOP attachments have been reviewed to determine if the headers were correct at the top of the pages. One additional AOP-014 header deficiency was found, and has been corrected. All other AOP two column format attachments that are performed in the field by an AO have been reviewed to determine if similar transition discrepancies existed, and no procedure limiting discrepancies were noted. Therefore, this deficiency is considered to be an isolated event, and no further corrective steps are necessary.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved.