

PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9505180316 DOC. DATE: 95/05/09 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: Forwards response to NRC 950405 ltr re violations noted in
insp rept 50-261/95-07. Corrective actions: engineering svc
request number 9500236 was initiated to establish compliance
w/Type B testin requirements of 10CFR50 App J.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
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/SPD/RAB	1 1
	AEOD/TTC	1 1	DEDRO	1 1
	<u>FILE CENTER</u>	1 1	NRR/DISP/PIPB	1 1
	NRR/DORS/OEAB	1 1	NRR/DRCH/HHFB	1 1
	NUDOCS-ABSTRACT	1 1	OE DIR	1 1
	OGC/HDS3	1 1	RGN2 FILE 01	1 1
EXTERNAL:	LITCO BRYCE, J H	1 1	NOAC	1 1
	NRC PDR	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 17 ENCL 17

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T



Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 13510E

Serial: RNP-RA/95-0081

MAY 09 1995

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. 50-261/95-07

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 50-261/95-07, which was transmitted by letter dated April 9, 1995. The Notice of Violation involved the failure to correct the necessary documents to comply with the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications.

As requested in the letter transmitting the Notice of Violation, the enclosure states the violation, the reason for the violation, the corrective steps that have been taken and the results achieved, the corrective steps that will be taken to avoid further violations, and the date when full compliance will be achieved.

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

DTG:dtg
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

10 CFR 50, Appendix B, Criterion III, Design Control, requires, in part, that applicable regulatory requirements are correctly translated into specifications, drawings, procedures and instructions.

Technical Specification 4.4.1.2 specifies a Sensitive Leak Rate Limit for the Penetration Pressurization System of 0.3Lp, i.e., 30% of the allowable containment leakage, at which point repairs must be made.

This requirement is translated into the controlling procedure OMM-008, Minimum Equipment List and Shift Relief, by Design Calculation 91-C-0005, which specifies a measured leak rate of 1.57 scfm as the measured leak rate limit at which repairs must be made in order to comply with Technical Specification 4.4.1.2.

Contrary to the above, when on June 16, 1994, a plant configuration change was made to the Penetration Pressurization System which reduced the allowable measured leakage to comply with Technical Specification 4.4.1.2, procedure OMM-008, Minimum Equipment List and Shift Relief, was not corrected to specify the new leakage limit.

Reply

Carolina Power & Light Company agrees that the violation occurred as described.

1. The Reason for the Violation

This event was caused by personnel error. Technical Support personnel failed to identify that an applicable regulatory requirement was required to be translated into plant procedures when the plant's configuration was changed. On June 10, 1994, Engineering Evaluation (EE) No. 94-094 evaluated Penetration Pressurization System (PPS) excessive leakage identified on "B" and "C" Main Steam line containment penetrations. The EE determined that these two penetration PPS lines could be isolated since the PPS leakage was identified only on the inner bellows by an unqualified leakage detection method. The PPS supply to the "B" and "C" Main Steam line penetrations was isolated because the PPS leakage measurement approached the upper limit of the affected PPS header, and the ability of PPS to perform continuous monitoring on the remaining penetrations was degraded.

The EE required repairs of the penetration sleeves to be performed at the next scheduled shutdown. Repairs could not be performed at the time due to high radiation dose rates and excessive temperatures associated with the sleeve locations inside containment. In addition, quarterly testing was performed to monitor the affected penetrations until repairs were made.

However, the system engineer failed to recognize that containment integrity can only be determined by a qualified leakage detection method. Plant Operations Management Manual (OMM) procedure OMM-008, "Minimum Equipment List and Shift Relief" (MEL), should have been revised to deduct the leakage contribution from "B" and "C" Main Steam line penetrations when the PPS supply was isolated to the penetrations. Because the system engineer did not recognize that the provisions of EE 94-094 did not include a qualified leakage detection method, the system engineer failed to follow through with the required procedure change. Reviews of the EE failed to detect the need to revise the MEL. Therefore, the MEL maximum allowable PPS leakage, as monitored by operations in the control room, was not revised to compensate for the known Main Steam line penetrations PPS leakage when the PPS supply lines were isolated.

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

As a result of NRC questions, Engineering Service Request No. 9500236 was initiated to establish compliance with Type B testing requirements of 10 CFR 50 Appendix J when PPS is isolated to the "B" and "C" Main Steam line penetrations. The PPS leakage of the affected steam line penetrations was determined, and procedure OMM-008 was revised accordingly. The allowed PPS leakage was reduced by the leakage amount on March 3, 1995. Additionally, a comprehensive review was conducted of all completed OMM-008 procedures performed during the times that PPS was isolated to the "B" and "C" Main Steam line penetrations. The review determined that at no time did PPS leakage exceed the revised limit; therefore, containment leakage remained within the required TS limit.

The original system engineer and subunit manager are no longer employed with the company, and these employees could not be counselled.

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

The Robinson Engineering Support Section was provided with "real-time" training on this occurrence to ensure that all engineers are made aware of these requirements and to re-enforce a broader perspective and questioning attitude when faced with abnormal events of this nature in the future. This training was completed on March 30, 1995.

Technical Support Management Manual (TMM) procedure TMM-005, "10CFR50, Appendix "J" Testing Program," will be revised to provide guidance on the required actions to be taken when isolating PPS from containment penetrations.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved by July 3, 1995.