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SUBJECT: Responds to violations noted in insp rept 50-261/95-27.
Corrective actions: training provided to operations
personnel re venting/drainage requirements of procedure
operations mgt manual.

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DEC 14 1995

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Robinson Nuclear Plant

Robinson File No.: 13510E
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United States Nuclear Regulatory Commission
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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. 50-261/95-27
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 No. 50-261/95-27 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by letter dated November 17, 1995. The Violation involves an inadequate clearance for removing the B Emergency Diesel Generator from service, causing the engine to unexpectedly start and run without normal engine support equipment properly aligned. As requested in the letter transmitting the Notice of Violation, the enclosure restates the violation, followed by our reply. This reply is required to be submitted to the NRC by December 17, 1995.

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

Very truly yours,

C. S. Hinnant

C. S. Hinnant
Vice President

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Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
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JEH

REPLY TO A NOTICE OF VIOLATION

Violation

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, including procedures for controlling the clearance (tagout) of safety-related equipment. Implicit in this requirement, is the requisite that the procedures be adequate for the circumstances.

Local Clearance and Test Request (LCTR) 95-01384 was developed to control the clearance of the B Emergency Diesel Generator in order to conduct scheduled preventative maintenance.

Contrary to the above, LCTR 95-01384 was inadequate, in that, it did not provide adequate instructions for ensuring that the air start system piping associated with the B Emergency Diesel Generator was properly isolated and depressurized. As a result, on September 26, 1995, while implementing the clearance, the air start piping was depressurized through the diesel's air start distributor, resulting in the diesel starting unexpectedly. The diesel operated for approximately seven minutes without all of its normal support equipment properly aligned.

Reply

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

1. The Reason for the Violation

This violation was caused by personnel error. The individuals who prepared Local Clearance and Test Request (LCTR) 95-01384 failed to establish positive controls to prevent the "B" Emergency Diesel Generator (EDG) from starting.

The standard EDG clearance, typically used for EDG maintenance, depressurizes the affected portion of the starting air system by venting the piping to the engine. An insufficient air volume exists in the piping to start the engine. LCTR 95-01384 was prepared to allow repair of a valve which is normally used to isolate EDG starting air. Consequently the standard LCTR boundary was changed to include an additional section of starting air piping. The individuals who prepared LCTR 95-01384 incorrectly judged that the increased volume of the additional section of starting air piping would not be sufficient to start the EDG.

Additional positive controls to prevent the engine from starting, such as tripping the fuel racks, were not specified in the clearance. When the EDG was placed under clearance, the engine inadvertently started. Misjudgement and incorrect assumptions were made by the LCTR preparers when available methods to prevent an engine start or to vent the system were not established.

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

Site engineering personnel completed an evaluation to determine if any adverse effects occurred from the "B" EDG operating without all of its support equipment properly aligned. This review, which involved support from the engine vendor, concluded that no damage occurred to the "B" EDG or its air start distributor system due to the event.

A review was conducted of previous operating experience where LCTR activities created an inadvertent or unplanned equipment start, events involving incorrectly venting and draining of systems under clearance, and events where wrong assumptions contributed to clearance related errors. This review revealed that corrective actions for previous events were not sufficient to preclude this event, in that those corrective actions focused on the specific events rather than the broader need for conservative decisions where judgement must be made in preparing LCTRs.

Training has been provided to Operations personnel regarding the venting/draining requirements of procedure Operations Management Manual (OMM)-005, "Clearance and Test Request." This training, which included reviews of previous operating experiences, focused on the need for conservative decisions regarding activities involving Engineered Safety Feature equipment operation and clearances.

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

The actions taken include steps to avoid further violation.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved.