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SUBJECT: Responds to NRC 960916 ltr re violations noted in insp rept
 50-261/96-10. Corrective actions: performed evaluation of ASCO
 solenoid operating valves, revised plant procedures covering
 OE program & will include event in training program.

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Robinson Nuclear Plant

Robinson File No: 13510E
Serial: RNP-RA/96-0179

OCT 15 1996

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. 50-261/96-10
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. 50-261/96-10 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated September 16, 1996. Violation A involves a failure to initiate adequate corrective actions after identifying design deficiencies associated with safety related solenoid operated valves. Violation B involves a failure to provide adequate illumination for certain areas in the Protected Area. As requested in the letter transmitting the Notice of Violation, the enclosure restates each violation, followed by our reply. This reply to a notice of violation is required to be submitted by October 16, 1996.

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

9610210174 961015
PDR ADOCK 05000261
Q PDR

RDC/klb
Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
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IEO11/

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REPLY TO A NOTICE OF VIOLATION

Violation A

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, defective material and equipment, are promptly identified and corrected.

Contrary to the above, the licensee failed to take adequate corrective actions in May 1995, after it was identified that the supplied air pressure exceeded the design rating for fourteen safety related solenoid operated valves. As a result, the adverse conditions remained unanalyzed until May 1996.

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 initial review of NRC Information Notice (IN) 88-24, "Failures of Air-Operated Valves Affecting Safety Related Systems," dated May 13, 1988, did not adequately evaluate certain concerns addressed by the IN that related to ASCO model Solenoid Operating Valves (SOVs) being exposed to differential air pressures greater than the design Maximum Operating Pressure Differential (MOPD) rating. A self-initiated re-review of selected historical Operating Experience (OE) information, which included this Information Notice, was conducted in 1995. Due to personnel error in that the applicable procedure was not followed, adverse conditions identified by the reviewer during the 1995 re-review of IN 88-24 were not evaluated for significance and documented, as required by procedure, within the Corrective Action Program (CAP), nor were the identified corrective actions adequately closed. Additionally, a lack of adequate management oversight during the 1995 re-review contributed to not identifying and resolving the SOV misapplication in a timely manner.

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

An evaluation of the ASCO SOVs was performed to identify SOVs misapplied to systems in which the supply air pressure was in excess of the MOPD rating. Priority was given to safety-related applications. As discrepancies were identified, CAP Condition Reports (CRs) were initiated. Evaluation of the identified CRs has been completed and corrective actions are being taken and tracked to closure in accordance with the CAP requirements. Operability issues have been resolved, and there were no instances where Technical Specifications requirements were not met.

Of those safety related SOV applications that were originally identified where supplied air pressure exceeded the MOPD design rating, six (6) SOVs were for steam generator blowdown sample containment isolation valves. These six (6) SOVs were subsequently replaced with SOVs correctly sized for the respective application. The SOVs that were removed from the system were bench tested and pressurized to a point above the design pressure of the air system (i.e., 85-95 psig) and none leaked by their closed seat or out the exhaust port when de-energized. The bench test results were utilized to resolve the operability issues of the remaining eight (8) SOVs, as well as other SOVs identified during the evaluation of this event.

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

The lessons learned from this issue will be included in the Robinson Engineering Support Section (RESS) Real-Time Training Program. The training will include management expectations for identifying adverse conditions during OE information reviews and reinforce management expectations for quality of OE reviews.

Plant procedures covering the OE program have been revised to specifically state that if, during the evaluation of OE information, a potential operability concern exists, a CR be immediately initiated. This change is consistent with the existing requirements in the CAP procedure.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved by November 30, 1996, with the completion of Real Time Training on this concern.

Violation B

Chapter 3, Section 3.1.3 of the licensee's Industrial Security Plan, Revision 32, dated April 26, 1996, states, in part, "the exterior protected area will be lighted to a level sufficient for monitoring, surveillance, and observation requirements, but not less than 0.2 foot-candles measured horizontally at ground level. Compensatory measures for degraded illumination (less than 0.2 foot-candles) in exterior portions of the protected area will be in the form of increased visual surveillance."

Contrary to the above, on July 25, 1996, the area under two railcars positioned temporarily in the Protected Area failed to meet the illumination level of at least 0.2 foot-candles measured horizontally at ground level and compensatory measures for the degraded illumination conditions had not been implemented.

Reply

CP&L agrees that the violation occurred as described.

1. The Reason for the Violation

This event was caused by personnel error. Security Unit personnel failed to demonstrate sufficient attention to detail to detect and correct areas with inadequate illumination. Additionally, ineffective communications within the Security organization and between CP&L Nuclear Assessment Section management and Security Unit management resulted in failure to have illumination deficiencies corrected to meet the illumination requirements of our Industrial Security Plan and resulted in the failure to implement compensatory measures for uncorrected degraded illumination conditions. Also, the applicable security procedure did not provide adequate guidance for taking compensatory measures in response to inadequate illumination.

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

On July 25, 1996, Security personnel conducted a walkdown of the Protected Area, and deficiencies noted with respect to the Protected Area illumination were promptly corrected.

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

Disciplinary action was taken with the Security personnel who failed to effectively communicate and resolve the identified illumination deficiencies.

Security Procedures were revised to include guidance for compensatory measures in the event that Protected Area illumination does not meet Industrial Security Plan requirements.

Security force training lesson plans were reviewed for adequacy, and training sessions were conducted highlighting that Security officers should maintain cognizance of the area illumination requirements during patrol in addition to other Industrial Security Plan requirements.

On July 31, 1996, security illumination requirements, compensatory measures for degraded illumination specified in the Industrial Security Plan, and supervisory responsibilities for maintaining these requirements were reviewed and discussed with CP&L and Security management. Expectations regarding the responsibility for each Security shift were clearly identified during this meeting.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on October 3, 1996, when the changes to Security procedures became effective.