

# CATEGORY 1

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SUBJECT: Responds to NRC 970117 ltr re violations noted in insp rept  
 50-261/96-14. Corrective actions: WR has been initiated &  
 insp will be completed during refueling outage 18, currently  
 scheduled for Mar 1998.

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**CP&L**

FEB 18 1997

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Robinson Nuclear Plant

Robinson File No: 13510E  
Serial: RNP-RA/97-0026

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. 50-261/96-14  
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. 50-261/96-14 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated January 17, 1997. The violation involves failure to revise an engineering evaluation when an action specified in the evaluation was not completed. In accordance with the letter transmitting the Notice of Violation, the enclosure restates the violation, followed by our reply.

Should you have any questions regarding this matter, please contact Mr. H. K. Chernoff at (803) 857-1437.

Very truly yours,

*C. S. Hinnant*  
C. S. Hinnant  
Vice President

9702260195 970218  
PDR ADOCK 05000261  
Q PDR

Enclosure

c: Mr. L. A. Reyes, Regional Administrator, USNRC, Region II  
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP  
Mr. B. B. Desai, USNRC Senior Resident Inspector, HBRSEP

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## REPLY TO A NOTICE OF VIOLATION

### Violation

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings. Paragraph 5.14.5.1 of CP&L Procedure MOD-001, Engineering Evaluation Revision 16, requires engineering evaluations to be revised when the intent of the required action list is changed.

Contrary to these requirements, on December 6, 1996, it was discovered that engineering evaluation EE-93-159 associated with the containment vessel liner plates was not revised when the required actions to close the engineering evaluation were changed when work request 94-AHRZ1 was canceled. The reason for cancellation of work request 94-AHRZ1 was not documented.

### Reply

CP&L agrees that the violation occurred as described.

#### 1. The Reason for the Violation

This violation was caused by inadequate human performance. The Engineering Evaluation (EE) 93-159 established acceptance criteria for noted areas of the containment liner that exhibited corrosion, and initiated a required action for a future inspection of the containment vessel liner plates. This required action was closed in May 1994 by initiating Work Request (WR) 94-AHRZ1, which referenced this EE. On October 11, 1994, Engineering personnel did not adequately review the interrelationships between the WR and the EE, and not recognizing that the EE was the basis for the WR, determined that the containment liner inspection was not necessary, and canceled the WR. The engineer did not provide adequate documented justification for this action. As a result, the EE required action was not completed, and the EE was not revised as required by procedure MOD-001, "Engineering Evaluation."

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

A WR has been initiated to inspect certain areas of the containment liner in order to determine if there are any areas of corrosion that exceed the acceptance criteria specified in EE 93-159. This inspection will be completed during Refueling Outage 18, currently scheduled for March 1998.

Engineering Evaluations are now conducted in accordance with an Engineering Service Request (ESR) process described in procedure EGR-NGGC-005, "Engineering Service Requests." This procedure provides an action item tracking system utilized to track follow-up items required to fully implement an ESR. This procedure specifies that an ESR cannot be closed without prior closure of outstanding ESR action items. In addition to closing ESR action items, this procedure specifies that WRs must be "completed and approved" prior to closing the ESR.

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

Procedure Maintenance Management Manual (MMM)-003, "Maintenance Work Requests," will be revised by April 10, 1997, to strengthen controls for canceling WRs. The revised controls will require concise justification for WR cancellations.

Management expectations regarding adequacy of documenting justification for deleting WRs will be provided to personnel by April 10, 1997.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved by April 10, 1997.