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SUBJECT: Responds to NRC 970117 ltr re violations noted in insp rept.
50-261/96-14. Corrective actions: procedure maintenance mgt
manual (MMM)-003, "Maintenance Work Request," will be
revised by 970410, to strengthen controls.

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**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

MAR 27 1997

Robinson File No: 13510E
Serial: RNP-RA/97-0076

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
REVISED REPLY TO A NOTICE OF VIOLATION

Gentlemen:

This provides a revised 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. The Notice of Violation, which involves failure to revise an engineering evaluation when an action specified in the evaluation was not completed, was transmitted by NRC letter dated January 17, 1997, and the Carolina Power & Light (CP&L) Company reply was dated February 18, 1997. As requested by NRC letter dated March 3, 1997, the attached revised reply, which further describes corrective actions that will be taken, is being submitted by April 1, 1997. The revisions to the previous response are denoted with revision bars.

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

Very truly yours,

C. S. Hinnant
Vice President

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PDR ADOCK 05000261
Q PDR

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Attachment

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

0200091



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. Although the Engineering Evaluation (EE) 93-159 concluded that the corrosion identified was negligible with respect to the structural integrity of the containment liner, it 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 representative sample of other deleted WRs associated with the containment building were reviewed. No other WRs were identified that were associated with action items developed from other plant processes requiring field work.

Since the EE 93-159 concluded that the corrosion identified was negligible with respect to the structural integrity of the containment liner, no immediate corrective actions were determined necessary. The conclusions of this EE were confirmed to remain valid during the evaluation of this issue. However, 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 the next cold shutdown of sufficient duration, but no later than Refueling Outage 18, currently scheduled to begin in 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 with respect to the violation will be achieved by April 10, 1997. Additional inspections of the containment liner will be completed during the next cold shutdown of sufficient duration, but no later than Refueling Outage 18, currently scheduled to begin in March 1998.