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 KEENAN, J.S. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 970418 ltr re violations noted in insp rept
 50-261/97-04. Corrective actions: initiated freeze pack temps,
 mgt reviewed occurrence w/ individuals involved, counseled
 Maint Unit supervisor & maint mgt reviewed issue w/ staff.

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Robinson Nuclear Plant

Robinson File No: 13510E

Serial: RNP-RA/97-0113

MAY 16 1997

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. 50-261/97-04
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

The attachment to this letter provides the Carolina Power & Light (CP&L) Company reply to the Notice of Violation identified in NRC Inspection Report No. 50-261/97-04 for the H. B. Robinson Steam Electric Plant (HERSEP), Unit No. 2, which was transmitted by NRC letter dated April 18, 1997. The violation involves failure to follow procedures for installation of temperature monitoring equipment, and documenting freeze pack temperatures, during a pipe replacement activity on the service water system. In accordance with the letter transmitting the Notice of Violation, the attachment 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,

A handwritten signature in cursive script that reads "John S. Keenan".
J. S. Keenan
Vice President

Handwritten: IEO1
1/1

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

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PDR ADOCK 05000261
Q PDR



REPLY TO A NOTICE OF VIOLATION

Violation

Technical Specification 6.5.1.1.1, Procedures, Tests, and Experiments states that written procedures shall be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978, which includes maintenance on safety related systems.

Contrary to the above, on February 24, 1997, during performance of Special Process Procedure SPP-002, Freeze Plugging of Piping Not Requiring Brittle Fracture, steps 7.3.3, 7.3.8, 7.3.9, and 7.4.2 were not followed. Specifically, maintenance personnel did not appropriately monitor and log freeze pack temperatures utilizing three thermocouples during a pipe replacement activity on the service water system.

Reply

CP&L agrees that the violation occurred as described.

1. The Reason for the Violation

This violation was caused by personnel error. The pre-job briefing for the pipe replacement included emphasis on expectations to read and understand procedure Special Processes Procedure (SPP)-002, "Freeze Plugging of Piping Not Requiring Brittle Fracture." Step 7.4.2 required that the freeze seal plug temperature be monitored and recorded at 15 minute intervals. Steps 7.3.3, 7.3.8, and 7.3.9 required thermocouples to be installed on pipe sections at the freeze seal plug area, upstream of the freeze seal jacket, and downstream of the freeze seal jacket, respectively. Maintenance personnel conducting the pipe replacement did not conduct an adequate review of SPP-002 prior to initiating work, and did not have a clear understanding of the procedure requirements. Consequently, only two thermocouples (i.e., the thermocouples upstream and downstream of the freeze seal jacket), were utilized during the pipe replacement work. In addition, maintenance personnel did not initiate the required temperature recordings as required by step 7.4.2 until questioned by the NRC inspector.

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

Following discussion with the NRC Senior Resident inspector on the requirements of SPP-002 for recording temperature data, Maintenance personnel conducting the pipe replacement initiated recording freeze pack temperatures.

Management has reviewed this occurrence with the individuals involved. During this review, the need to follow instructions and procedures in detail was emphasized and reinforced.

The Maintenance Unit supervisor that was present at the job site has been counseled regarding management expectations and good work practices during job performance and when using procedures.

Maintenance management has also reviewed this issue with their staff. During this review, management expectations relating to procedure and work instruction adherence and taking time to completely read and understand procedures and work instructions prior to starting work, were reinforced.

Procedure Maintenance Management Manual (MMM)-001, "Maintenance Administration Program," has been revised to include pre-job briefing criteria and a checklist specifically designed to be used for maintenance activities. Additionally, management has reviewed expectations for pre-job briefings with Maintenance supervisors.

Although not directly the cause of this violation, procedure SPP-002 was revised to improve the discussion of when monitoring and recording freeze seal plug temperatures is required.

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

The corrective actions that have been taken will avoid further violations.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 15, 1997, with the implementation of the pre-job briefing checklist.