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**Carolina Power & Light Company**

Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

Robinson File No: 13510E  
Serial: RNP-RA/97-0148

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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**JUN 24 1997**

**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
NRC INSPECTION REPORT NO. 50-261/97-06  
RETRANSMITTAL OF COVER LETTER TO  
REPLY TO A NOTICE OF VIOLATION**

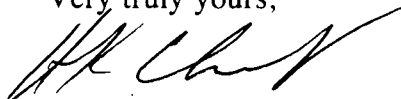
Gentlemen:

By letter issued June 23, 1997, Carolina Power & Light (CP&L) Company submitted a reply to the Notice of Violation identified in NRC Inspection Report No. 50-261/97-06 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The letter (i.e., Serial: RNP-RA/97-131) submitting the reply was signed on June 23, 1997. However, the letter was inadvertently mailed without the date of the letter stamped on the cover page.

A date-stamped copy of the cover letter and attachment, is included as an attachment to this letter.

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

Very truly yours,

*for*   
T. M. Wilkerson  
Manager - Regulatory Affairs

*IEO 1/1*

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Q PDR

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



H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
RE-TRANSMITTAL OF COVER LETTER TO  
REPLY TO A NOTICE OF VIOLATION IDENTIFIED IN  
NRC INSPECTION REPORT NO. 50-261/97-06

  
Carolina Power & Light Company  
3581 West Entrance Road  
Hartsville, SC 29550

J. S. Keenan  
Vice President  
Robinson Nuclear Plant

Robinson File No: 13510E  
Serial: RNP-RA/97-0131

**JUN 23 1997**

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. 50-261/97-06  
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. 50-261/97-06 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated May 23, 1997. The violation involves inadequate Engineered Safety Features (ESF) testing procedures that allowed ESF trains to be inoperable for testing without invoking a Technical Specification Action Statement. 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,

  
J. S. Keenan  
Vice President

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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## 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 covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978, including procedures for Engineered Safeguards testing.

Contrary to the above, Maintenance Surveillance Test (MST) procedures MST-022 and MST-023, Safeguard Relay Rack Train "A" and "B" (Monthly), were inadequate in that they did not provide specific guidance and consequently allowed each train of safeguards to be bypassed without considering the train inoperable and entering a Technical Specification Action Statement.

### Reply

CP&L agrees that the violation occurred as described.

#### 1. The Reason for the Violation

This violation was caused by the failure to comprehensively implement guidance to enter a Technical Specifications (TS) Limiting Condition for Operations (LCO) Action Statement during surveillance testing which renders equipment inoperable where there are no compensatory measures in place which would demonstrate compliance with a TS Action Statement. Prior to 1994, plant operators did not consistently apply TS LCO Action Statements during the performance of Operations Surveillance Tests (OSTs). This practice was questioned in 1994. As a result, OSTs were reviewed to ensure consistency of entry into TS LCO Action Statements, and guidance was promulgated that Operators enter TS Action Statements during the performance of OSTs. However, this change in practice did not consider a review of other procedures that may require entry into TS Action Statements.

A contributing factor for this concern was a less than comprehensive understanding by some Operations personnel of the effects of performing surveillance testing on the safeguards system. With respect to performing Maintenance Surveillance Test (MST)-022 and MST-023, Safeguard Relay Rack Train "A" and "B" (Monthly), some operators were not aware that the respective train Safety Injection actuation from the functional unit is blocked during testing.

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

Night Order 97-014 was issued by Operations Management on April 25, 1997. This Night Order specifies that the action statement for TS 3.6.3.a, "Containment Automatic Isolation Trip Valves," will be entered when procedures MST-022 and MST-023 are performed. This specification represents the most limiting existing TS Action Statement for equipment affected by these MSTs. If a function or component should fail during the MST, then the TS Action Statement for that function or component should be entered.

Procedures MST-023 and MST-022 were revised on June 4, and June 9, 1997, respectively, to include notification of the Superintendent-Shift Operations that the next step will begin an LCO condition (TS 3.6.3.a).

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

Expectations for declaring equipment inoperable during testing will be developed and provided to Operations personnel by July 30, 1997.

Training will be provided to licensed Operators on the effects of testing on the safeguards system by August 30, 1997.

Guidance will be developed and provided to procedure writers by September 30, 1997, to ensure procedure actions that render TS equipment inoperable are provided with the applicable TS LCO Action Statement.

Applicable procedures, which have not been previously reviewed, that render TS equipment inoperable will be reviewed, and revised as necessary, to ensure the procedures specify the appropriate TS Action Statement. This action will be completed by November 30, 1997.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 4, and June 9, 1997, with the revisions to MST-023 and MST-022, respectively,