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ACCESSION NBR:9801070033 DOC.DATE: 97/12/31 NOTARIZED: NO DOCKET #
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SUBJECT: Responds to NRC 971205 ltr re violations noted in insp rept
 50-261/97-11.Corrective actions:evaluated subject SSCs &
 determined to be within scope of NRC Maint Rule & will
 provide training to expert panel members.

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DEC 31 1997

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Vice President
Robinson Nuclear Plant

Robinson File No: 13510E
Serial: RNP-RA/97-0260

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. 50-261/97-11
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. 50-261/97-11 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated December 5, 1997. The violations involve failure to include one structure and one system within the scope of the Maintenance Rule and failure to monitor the performance or condition of the Instrument Air System against licensee-established goals effectively as required by the Maintenance Rule. In accordance with the letter transmitting the Notice of Violation, the attachment restates the violations, 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,

Dale E. Young for JSK

J. S. Keenan
Vice President

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PDR ADDCK 05000261
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WMW/ww
Attachment



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

IED 11

REPLY TO A NOTICE OF VIOLATION

Violation 50-261/97-11-01

10 CFR 50.65(b) establishes the scoping criteria for selection of safety-related and non-safety related structures, systems and components to be included within the Maintenance Rule program. The scope shall include safety-related structures, systems, and components that are relied upon to remain functional during and following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, and the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the 10 CFR, Part 100 guidelines; and non-safety related structures, systems, and components that are relied upon to mitigate accidents or transients, or are used in the plant emergency operating procedures, or whose failure could prevent safety-related structures, systems, and components from fulfilling their safety-related function, or whose failure could cause a reactor scram or actuation of a safety-related system.

Contrary to 10 CFR 50.65(b), as of November 3, 1997, the licensee failed to include one structure (switchyard relay building) and one system (turbine exhaust hood spray) within the scope of the Maintenance Rule.

1. The switchyard relay building, a structure which contains non-safety related switchyard and transformer system protective relays whose failure could cause a reactor trip. A failure of this structure could cause a failure of these protective relays.
2. The turbine exhaust hood spray system, a non-safety related system whose failure could cause a reactor trip.

This is a Severity Level IV violation (Supplement I).

Reply

CP&L agrees that the violation occurred as described.

1. The Reason for the Violation

Contrary to the requirements of 10 CFR 50.65(b)(2), during the NRC Maintenance Rule (MR) inspection from November 3 through November 7, 1997, the NRC identified two systems, structures, and components (SSCs) that were not included in the scope of the MR program. These two SSCs are the Unit 2 switchyard relay house structure and the turbine exhaust hood spray system.

The root cause for these SSCs not being included in the scope of the MR program was inappropriate exclusion by the expert panel.

The Unit 2 switchyard relay house was not addressed by the expert panel. The protective relays in the relay house were included within the scope of the MR, however, the supporting structure was not considered for scoping due to an oversight.

The turbine exhaust hood spray system was not included because the expert panel inappropriately determined on two occasions during the scoping review that the system did not meet the criteria for inclusion in that it could not or did not result in a plant trip.

These examples of inappropriately scoped SSCs resulted from weaknesses in the program when initially implemented in 1995. Significant upgrade efforts were made in 1997 to correct programmatic weaknesses. Program improvements will continue based on industry experience and regulatory guidance

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

Both of these SSCs were evaluated by the MR expert panel on November 5, 1997, and determined to be within the scope of the MR. The switchyard relay house is monitored against structural inspection criteria. The turbine exhaust hood spray system is monitored against plant level criteria.

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

By February 27, 1998, the expert panel members will be provided training to ensure the expert panel members have a proper understanding of the MR scoping criteria.

By February 27, 1998, a review of SSCs excluded from the scope of the MR will be conducted to ensure that SSCs are properly scoped. This review will use industry operating experience, current regulatory guidance, and system engineer / expert panel input.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on November 5, 1997, when the expert panel determined that the exhaust hood spray system and the Unit 2 switchyard relay house were within the scope of 10 CFR 50.65(b)(2).

Violation 50-261/97-11-02

10 CFR 50.65(a)(1) requires, in part, the holders of an operating license shall monitor the performance or condition of structures, systems and components (SSCs), as defined by 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions. When the performance or condition of SSCs does not meet established goals, appropriate corrective action shall be taken.

Contrary to 10 CFR 50.65(a)(1), as of November 3, 1997, the licensee failed to monitor the performance or condition of the Instrument Air System against licensee-established goals effectively, in that the licensee did not adequately implement its monitoring program by failing to identify 13 hours and 49 minutes of unavailability for the "A" and "B" air compressors, which occurred on June 3, 1997, and 36 minutes of unavailability for the Primary Air Compressor, which occurred on June 27, 1997. Monitoring unavailability is necessary in order to provide reasonable assurance that the Instrument Air System (a high safety significant system) remained capable of performing its intended function.

This is a Severity Level IV violation (Supplement I).

Reply

CP&L agrees that the violation occurred as described.

1. The Reason for the Violation

Contrary to the requirements of 10 CFR 50.65(a)(1), during the NRC Maintenance Rule (MR) inspection from November 3 through November 7, 1997, the NRC identified that some unavailability for the instrument air system had not been collected and recorded.

The root cause for this SSCs unavailability not being fully monitored was inadequate program monitoring and management oversight. There was no formal oversight to ensure system engineers are properly monitoring unavailability.

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

On November 5, 1997, the system engineer collected and added the instrument air system unmonitored unavailability time to the MR database. This additional unavailability time did not cause the system to exceed its (a)(1) goals.

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

By January 16, 1998, the system engineers and supervisors will be briefed on the importance of and the expectations for accurate MR unavailability monitoring.

By February 27, 1998, procedures ADM-NGGC-0101, "Maintenance Rule Program," and TMM-040, "System and Component Trending Program," will be revised to provide better guidance for how to collect unavailability data for the MR program.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on November 5, 1997, when the system engineer collected and added the unmonitored instrument air system unavailability time to the MR database.