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YOUNG,D.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Records Management Branch (Document Control Desk)

SUBJECT: Responds to NRC 980608 ltr re violations noted in insp rept
50-261/98-05. Corrective actions: licensee completed required
surveillance test on 980413, revised plant procedure OMM-007
& discussed event w/ licensed personnel.

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Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510

Serial: RNP-RA/98-0130

JUL 08 1998

United States Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

NRC INTEGRATED INSPECTION REPORT NO. 50-261/98-05
REPLY TO A NOTICE OF VIOLATION

Dear Sir or Madam:

The attachment to this letter provides the Carolina Power & Light (CP&L) Company reply to the violation identified in NRC Inspection Report No. 50-261/98-05 dated June 8, 1998, for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

If you have any questions regarding this matter, please contact me or Mr. T. M. Wilkerson.

Very truly yours,

D. E. Young

Vice President - Robinson Nuclear Plant

PMY/pmy
Attachment

c: Mr. L. A. Reyes, USNRC, Region II
Mr. J. W. Shea, USNRC
USNRC Resident Inspector, HBRSEP

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PDR ADOCK 05000261
G PDR

**REPLY TO A NOTICE OF VIOLATION
FAILURE TO PERFORM PERSONNEL AIR LOCK TEST**

Violation 50-261/98-08-02

Technical Specification (TS) SR 3.6.2.1, Containment Systems, and TS 5.5.16, Containment Leak Rate Testing Program, requires that air lock leakage rate testing be performed in accordance with 10 CFR 50, Appendix J, Option A.

10 CFR 50, Appendix J, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors, requires that air locks opened during periods when containment integrity is required by TS shall be tested within three days after being opened. For air lock doors opened more frequently than once every three days, the air lock shall be tested at least once every three days during the periods of frequent opening.

Contrary to the above, the licensee failed to conduct an air lock test on April 13, 1998. At this time, the air lock was required to be tested every three days, and the last test had been successfully completed on April 10, 1998.

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

Administrative controls to ensure completion of conditional surveillance requirements were not adequate. The term conditional refers to surveillances that are not scheduled through the H. B. Robinson Surveillance Tracking System. As an operational aid for conditional surveillances the time and date of the required test was listed on a white board above the Shift Superintendent - Operations desk in the control room. This operator aid was visible to the control room staff, however, prioritization of work did not place the required emphasis on completing the surveillance. Shift turnovers conducted during the three day period did not include a discussion of conditional surveillances and their schedules.

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

The required surveillance test was completed at 1115 on April 13, 1998. Plant procedure OMM-007, "Equipment Inoperability Record" has been revised to include a requirement to document, track, and flag conditional surveillance requirements. The procedure was revised on June 16, 1998. The event has been discussed with licensed personnel emphasizing the proper priority and focus for completion of conditional required surveillances, the use of existing plant procedures (OMM-001-12) to turnover those conditional surveillance requirements and the requirements associated with testing at the end of the period when containment integrity is not required with respect to performing the air lock integrity test (OST-014, "LLRT of the Personnel Air Lock Door Seals"). This action was completed on June 5, 1998.

3. The Corrective Steps that will be Taken to Avoid Further Violations

The procedural changes discussed above are intended to prevent recurrence of missed conditional surveillances.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 13, 1998 with completion of the personnel air lock integrity test.