

Carolina Power and Light Company

H. B. Robinson 2

50-261/74-8

Ltr to N. C. Moseley fm Carolina Power and Light Company

dtd: 2/12/75

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dtd: **FEB 19 1975**

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N. W. SUITE 818
ATLANTA, GEORGIA 30303

FEB 19 1975

In Reply Refer To:
IE:II:NEB
50-261/74-8

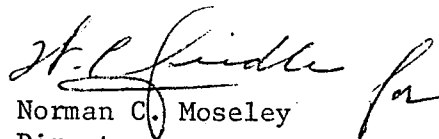
Carolina Power and Light Company
ATTN: Mr. J. A. Jones
Executive Vice President
Engineering, Construction and
Operation
336 Fayetteville Street
Raleigh, North Carolina 27602

Gentlemen:

Thank you for your letter of February 12, 1975, informing us of steps you have taken to correct the items of noncompliance concerning activities under NRC Operating License No. DPR-23 which was brought to your attention in our letter of January 16, 1975. We will examine your corrective actions and plans during subsequent inspections.

Should you have any questions concerning this letter, you may communicate directly with this office.

Very truly yours,


Norman C. Moseley
Director





Carolina Power & Light Company

February 12, 1975

File: NG-3513 (R)

Serial: NG-75-187

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Nuclear Regulatory Commission
Region II, Suite 818
230 Peachtree Street, N.W.
Atlanta, Georgia 30303

Dear Mr. Moseley:

H. B. ROBINSON UNIT NO. 2
LICENSE NO. DPR-23

RESPONSE TO RO INSPECTION REPORT NO. 50-261/74-8

This reply is in response to your letter of January 16, 1975, regarding violations identified during RO Inspection 74-8. As requested, you will find an enclosed response to Item I.A. and a description of the management action taken to improve the effectiveness of control of "Trouble Reports." Included in the statements are corrective steps that have been taken to prevent further violations and dates when compliance will be or has been achieved. This reply is submitted to you in accordance with Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. RO Inspection Report 74-8 has been reviewed and found to contain no information of a proprietary nature.

Violation I.A.

Technical Specification 6.4.1 requires that detailed procedures shall be prepared and adhered to for preventive and corrective maintenance. The licensee's administrative procedure Section 4.5 requires that a "Trouble Report" be filled out for items requiring maintenance. Contrary to these requirements "Trouble Reports" were not completed for certain maintenance items.

CP&L Response

An examination by the inspector of maintenance action regarding Abnormal Occurrences from August 6, 1974, to December 7, 1974, revealed that eight Trouble and Work Reports could not be located. It has been recognized prior to this inspection that the documentation of maintenance work via Trouble and Work Reports has not been stringently administered. This deficiency was highlighted by the subject inspection.

February 12, 1975

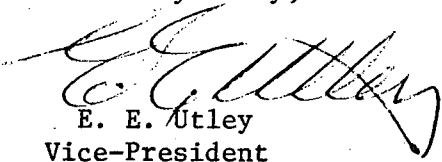
Efforts to rectify this problem were begun on November 1, 1974, with the issue of a revised Continuing Quality Assurance Manual, Volume 11 of the Plant Operating Manual. This manual places more importance on the use of "trouble tickets" in documenting corrective maintenance involving Q-List Systems. Since that time, the "ticket" format has been changed to provide for the required checkoffs and approvals and an additional copy has been attached to the form to improve routing. The "tickets" are reviewed daily (during work week) by plant Quality Assurance personnel to assure their adequacy prior to actual accomplishment of work. These actions have re-emphasized the "trouble ticket" and brought attention to the importance of its utilization and routing.

In the past "trouble tickets" were not as closely scrutinized or controlled, and it is possible that the "tickets" which were not located were never written or were lost in routing. Of the eight "tickets" which were not retrievable only two of these occurred after the revised Quality Assurance program took effect. Additionally, one of these was not related to Q-List items and would, therefore, not be retained in the plant QA files.

The details of the inspection report also alludes to the circuitous routing of "trouble tickets" which creates a problem of prompt feedback of maintenance status to operations personnel. This problem is recognized, and the routing of the "tickets" has been revised such that maintenance personnel now return the operations copy directly to the control room rather than routing it through the plant general office. It is anticipated that this will correct the feedback problem. Q-List related "tickets" will continue to be filed in the QA files, and the retention of other maintenance records shall be at the discretion of maintenance personnel.

The importance of proper procedures and documentation is recognized as a vital part of the safe operation of this facility. The maintenance of safety related items and the documentation of such work is paramount, and a vigorous and concerted effort is being and shall continue to be made to emphasize this to cognizant plant personnel. It is felt that the above steps will remedy the deficiencies cited.

Yours very truly,



E. E. Utley
Vice-President
Bulk Power Supply

DBW:mvp

cc: Messrs. N. B. Bessac
P. W. Howe
R. E. Jones
J. B. McGirt
D. B. Waters

Letter to N. C. Moseley from Carolina Power and Light Company dated January 24, 1975.

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Carolina Power & Light Company

January 24, 1975

File: NG-3513 (R)

Serial: NG-75-074

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
Region II, Suite 818
230 Peachtree Street, N.W.
Atlanta, Georgia 30303

Dear Mr. Moseley:

H. B. ROBINSON UNIT NO. 2
LICENSE NO. DPR-23
"B" STEAM GENERATOR BOLT

An inspection of H. B. Robinson steam generator supports was conducted during the 1974 refueling outage. This inspection revealed that one of the upper support bolts was missing on the "B" Steam Generator. This condition was referred to the plant architect-engineer, Ebasco Services, Inc., and a verbal statement was obtained to the effect that the integrity of the support was not jeopardized by the missing fastener. This conversation was to be confirmed by a written report. The inspection was reported to the AEC.

However, when the Ebasco report of November 8, 1974, was issued the evaluation of the condition was revised. Ebasco stated that it was their technical judgement that the missing bolt be replaced at the next scheduled plant shutdown. This was based upon meeting the criteria and limits established for the design, but the conservatism in design led to their technical opinion that in the event of a LOCA the system would not fail even with one bolt not installed.

Based on this recommendation efforts were then begun to obtain a certified bolt and fasteners for insertion in the vacant position of the support. The bolt was obtained and certification verified by December 30, 1974. An outage was then scheduled for January 3, 1975 specifically to replace the missing bolt. Subsequently, on January 3, 1975 after the unit was placed in a hot

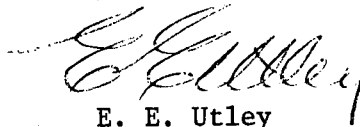
Mr. Norman C. Moseley

-2-

January 24, 1975
Serial: NG-75-074

shutdown condition and radiation levels permitted safe entry around "B" Steam Generator, the insulation was removed from around the support and the bolt was installed. No problems were encountered with the installation. Therefore, the support has been returned to its as-designed condition and all corrective action completed.

Very truly yours,



E. E. Utley
Vice President
Bulk Power Supply

DBW:bn

cc: Mr. N. B. Bessac
Mr. T. E. Bowman
Mr. W. E. Graham
Mr. P. W. Howe
Mr. J. B. McGirt
Mr. D. B. Waters