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EURY,L.W. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
LIEBERMAN,J. Ofc of Enforcement (Post 870413)

SUBJECT: Responds to NRC 891115 notice of violation & proposed imposition of civil penalty EA 89-188.

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w/check
$75,000
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CP&L
Carolina Power & Light Company
P. O. Box 1551 • Raleigh, N. C. 27602

DEC 1 5 1989

SERIAL: NLS-89-319

LYNN W. EURY
Senior Vice President
Operations Support

Mr. James Lieberman
Director, Office of Enforcement
United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REPLY TO A NOTICE OF VIOLATION
ENFORCEMENT ACTION 89-188

Mr. Lieberman:

Pursuant to the provisions of 10CFR2.201, please find enclosed Carolina Power and Light Company's (CP&L) reply to the Notice of Violation (NOV) and Proposed Imposition of Civil Penalty (EA 89-188) transmitted by Mr. S. D. Ebneter's letter of November 15, 1989. Carolina Power and Light Company acknowledges the violation; accordingly a check in the amount of $75,000 is remitted in payment of the civil penalty. The required written statement and explanation which constitutes CP&L's reply is provided as Attachment I.

Should you have any questions regarding this reply or wish to further discuss these issues, please do not hesitate to contact me.

Yours very truly,

L. W. Eury

JSK/bjw (552CRS)
Attachment
cc: Mr. S. D. Ebneter
Mr. L. Garner (NRC - HBR)
Mr. R. Lo

L. W. Eury, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Lisa M. Randall
Notary (Seal)

LISA RANDALL NOTARY PUBLIC WAKE COUNTY, N.C.

My commission expires: 6-7-93

IE14
1/1
w/check $75,000
#289271

ATTACHMENT I

REPLY TO SEVERITY LEVEL III VIOLATION

Statement of Violation

The NRC Notice of Violation states as follows:

During the Nuclear Regulatory Commission (NRC) inspection conducted on July 10-28, 1989, August 14 - September 8, and August 28 - September 1, 1989, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1989), the Nuclear Regulatory Commission proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violation and associated civil penalty are set forth below:

> 10 CFR Part 50, Appendix B, Criterion XVI, states that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.
>
> Contrary to the above, the licensee failed to establish measures to adequately assure that indications of significant Auxiliary Feedwater (AFW) system deficiencies were evaluated and the deficiencies corrected in a timely manner. Specifically, from January 6, 1983, until August 21, 1989, a time period during which Technical Specifications periodically required AFW operability, the AFW system design provided an inadequate suction supply for the AFW pumps. This condition continued to exist without being properly evaluated and corrected despite an August 27, 1987, internal safety system functional inspection of the AFW system and a July 1989 Nuclear Engineering Department calculation indicating inadequate system net positive suction head.

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

Civil Penalty - $75,000.

CP&L Response

1. Admission or Denial of the Violation

   CP&L acknowledges the violation.

2. Reasons for the Violation

A detailed review has been conducted which focused on the failure to promptly identify and correct deficiencies in the AFW System. This review identified certain major causal factors which acted both individually and collectively in creating the conditions which resulted in this violation.

a) The AFW System Technical Specifications required that the AFW pumps be operable. Available design basis information did not establish criteria for demonstrating 3-pump system operability. When flow anomalies were observed during simultaneous operation of all AFW pumps, it was assumed that the individual pump Technical Specification operability requirement fulfilled the design basis. Thus, the AFW flow anomaly was not translated into an operability investigation. This assumption and approach is now known to be incorrect.

b) The corrective action programs in effect at that time were not structured to ensure a high degree of visibility or attention, and did not require a formal, procedurally-driven evaluation. These programs, when combined with the operability assumptions discussed above, did not ensure that the AFW flow anomalies were resolved on a high priority basis.

3. Corrective Steps Which Have Been Taken and the Results Achieved

On August 24, 1989, a special independent investigation team was formed to investigate the events leading to the unit shutdown. The team members had no previous involvement with any prior AFW System evaluations or investigations, and reported to organizations which are independent of Plant Management. The mission of this team was to "conduct an independent investigation of the process used in identifying the condition of inadequate AFW pumps NPSH to determine causal factors and root cause." This investigation identified major issues, root cause, and recommendations. Also, the results of this investigation were presented at the referenced Startup and Enforcement Conferences.

4. Corrective Steps Which Will Be Taken to Avoid Further Violation

Corrective actions have been taken or are planned which will address the causal factors which acted both collectively and individually to create the conditions which resulted in this violation. These actions are specified as follows:

a) The Design Basis Reconstitution Program, previously implemented, continues toward scheduled completion for safety related systems in 1992. As the design basis information is retrieved and integrated into the system design basis documents, needed information is noted and reconstructed when necessary to demonstrate critical system design basis attributes. This program has supported operability determinations in the past and should continue to do so in the future.

A review has also been conducted to identify situations where similar interpretations of system operability may have been applied. This review, which was completed on October 20, 1989, did not identify any such situations. However, in the event that questions regarding operability arise in the future, "Operability Determinations Interim Guidelines" was issued on October 25, 1989. A formal, proceduralized process for these determinations will be implemented prior to unit startup from Refueling Outage No. 13.

b) Actions have been taken or are planned to address the issues of Technical Support Unit work control and prioritization. These actions will also be applied to other work groups on the plant site. To address the issue of prioritization, a procedural methodology has been utilized to prioritize the items entered into the Corrective Action Program. This program is administered by plant procedure PLP-026, "Corrective Action Program." This prioritization, which was completed on October 20, 1989, utilized the Nuclear Generation Group Guideline, NGGM 305-05, "Prioritization Process." Implementation of this prioritization procedure for Corrective Action Programs will be completed by June 1, 1990.

To ensure critical items are identified and made visible to plant management, interim guidelines have been implemented. On October 18, 1989, "Interim Guidelines for Plant Management Visibility of Corrective Action Items - Identification, Tracking, and Resolution" was issued. These guidelines require that a weekly list of prioritized items of concern be provided from Section and Unit Managers. These listings are compiled and distributed weekly for plant management review and comment.

Also, a team has been formed to examine and upgrade the work management process used at HBR2. The goal of this team is to develop a formal process that results in uniform prioritization, significance determination, and root cause analysis. As part of this project, the team will develop a Technical Support Work Management Action Plan, which includes participation in System Teams, identification and prioritization of system problems, and integration into the site work management process. This work management process will also be integrated with the Corrective Action Program and the implementation of the formalized prioritization guidance. Implementation of the Technical Support work management program activities will be completed by June 1, 1990. Application of these practices on a site-wide basis will be completed by December 31, 1991.

The site currently has in effect a corrective action program which is intended to capture significant off-normal conditions and assure their proper resolution. The Corrective Action Program has been successful in identifying, documenting, and tracking concerns and off-normal conditions. However, certain enhancements have been made or are planned to increase the effectiveness and visibility of the program. Also, as detailed

within our response to NRC Inspection Report No. 50-261/89-10, certain refinements have been identified to improve the overall effectiveness of the Corrective Action Program. The upgraded program should provide an effective means for providing a formal, visible, procedurally-driven review of significant off-normal conditions.

5. Date When Full Compliance Will Be Achieved

The dates for completion of the corrective actions described above are provided with the associated corrective action description.