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SUBJECT: Supplemental response to NRC 880624 ltr re violations noted
 in Insp Rept 50-261/88-07.Corrective actions:kickouts added.

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Carolina Power & Light Company

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U.S. 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. 50-261/88-07, SUPPLEMENTAL REPLY

Gentlemen:

Carolina Power and Light Company (CP&L) provides this supplemental reply to our letter of June 24, 1988, (Reference), which discussed a Severity Level V Violation (RII-88-07-01-SL5) described in USNRC Inspection Report No. 50-261/88-07. The original reply to the violation also addressed a June 7, 1988 event which involved similar circumstances. This supplement was requested by NRC Region II in their letter of July 8, 1988.

Supplemental Reply

1. Admission or denial of the violation

CP&L acknowledges the violation.

2. The reason for the violation

The incident of April 30, 1988 involving a Reactor Coolant System (RCS) leak, and the incident which occurred on June 7, 1988, involving a minor explosion of a 55-gallon hydrazine drum, both related to failure to properly implement Plant Emergency Plan procedures.

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To determine causal factors associated with both events, a formal evaluation was performed utilizing a Human Performance Evaluation System. The following causal factors were identified for the April 30 event (Event 1):

- 1.1 No one procedure ties all reporting requirements together.
- 1.2 No condition requiring entry into Plant Emergency Procedure (PEP-101, "Initial Emergency Actions") classifying Emergency Action Levels (EALs) was recognized by the Shift Foreman.
- 1.3 The Shift Foreman's proficiency with classifying EALs in the context of responding to an in-progress operational problem, was lower than his proficiency with Emergency Operating Procedures (EOPs) due in part to:
 - a. format of and familiarity with PEP-101, and
 - b. retention of training.
- 1.4 Plant management had not effectively defined or enforced job performance standards to require that PEP-101 always be reviewed for any off-normal event.

The following causal factors were identified for the June 7 event (Event 2):

- 2.1 Plant management control and communications were not effective in ensuring that PEP-102, "Unusual Event", was carried out.
- 2.2 The Shift Foreman was not proficient in making Emergency Plan notifications.
- 2.3 The shift team, and specifically the Senior Control Operator, was not utilized to ensure compliance with PEP-102.
- 2.4 The concern by Plant management to "carefully characterize" an event which was over instantly and had no safety significance sent the wrong message to the Shift Foreman concerning notification requirements.
- 2.5 Multiple layers of Plant management were involved in classifying the event and directing the notifications, which complicated the task and diffused responsibility.
- 2.6 Plant management had not clearly defined or enforced the job standards and practices to ensure that PEP-102 was carried out.

The following causal factors were common to both events and represent apparent root causes:

1. Required procedures were not followed.
 2. Proficiency in using Plant Emergency Procedures was not satisfactory.
 3. Adherence to procedures was not assured by Plant management.
- 3&4. The corrective steps which have been taken and the results achieved, and the corrective steps which will be taken to avoid further violations
1. A single reference will be developed for determining required reports, e.g., 10CFR50.72, Emergency Plan, Technical Specifications, etc. This will either be a revision to AP-030, "NRC Reporting Requirement", or a separate document. (Causal Factors Events 1.1 and 1.2). Scheduled completion - prior to power operations following the upcoming refueling outage.
 2. Where appropriate, "kickouts" (directed transitions) from the AOPs to the PEPs will be added. Such kickouts have been added or have previously existed for RCS leakage (through OST-151), responses to Radiation Monitoring Alarms, gaseous and liquid releases, and spent fuel accidents. Additional kickouts will be evaluated and appropriate changes made. Schedule for completion - prior to power operation following the upcoming refueling outage (Causal Factor Event 1.2).
 3. PEP-101 will be rewritten or reformatted to be more consistent with the EOPs, i.e., two-column format or flowpath. Additionally, a Users' Guide similar in content to OMM-022, the Emergency Operating Procedure Users' Guide, will be developed for the Plant Emergency Procedures. The purpose of this document will be to prescribe the rules of usage for the PEPs, how to transition from one PEP to another, and to provide guidance on what discretion is available to the Shift Foreman or Site Emergency Coordinator in implementing the PEPs. The scope of this project will include an improved PEP-101, a basis document for the EALs, the Users' Guide, and pre-implementation training and validation. Schedule for completion - May 30, 1989 (Causal Factors Events 1.2, 1.3, 1.4, and 2.1 through 2.6).
 4. Shift Foremen and the shift teams' proficiency in utilizing the PEPs will be emphasized in 1988 licensed Operator Retraining Weeks 4 and 5.

Week 4 of the Retraining was completed on August 5, 1988, and included 10 hours of instruction on the PEPs, including PEP-101 through -105, -171, and -301. All licensed Operators were required to pass a written test which included requalification as an Emergency Communicator. (Causal Factors Events 1.3, 2.2, and 2.3).

During Week 5 of the Simulator portion of retraining, each Shift Foreman will be required to classify an event and complete implementation of the appropriate PEPs, including notifications. Week 5 of Retraining will be completed by October 27, 1988. (Casual Factors Events 1.3, 2.2, and 2.3).

Additionally, the Robinson Training Unit will revise TI-909, "Simulator Conduct of Operations and Instructor Qualifications", to provide additional guidance to instructors on conducting Simulator exercises. The instructors will ensure that the appropriate PEPs are reviewed by the Operators during off-normal event scenarios conducted during initial training and retraining on the Simulator. Schedule for completion - October 31, 1988 (Casual Factors Events 1.3, 2.2, and 2.3).

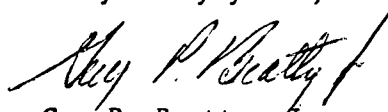
5. The Operations Manager will meet with all Operations personnel to discuss the requirements for following procedures and the philosophy behind these requirements. Schedule for completion - September 30, 1988 (Causal Factors Events 1.4 and 2.6).

5. The date when full compliance will be achieved

Full compliance will be achieved by May 30, 1989.

Should you have any question concerning this submittal, please contact Mr. J. M. Curley, (803) 383-1367.

Very truly yours,



Guy P. Beatty, Jr.

Vice President

Robinson Nuclear Project Department

JJS:jch

cc: Dr. J. N. Grace
Mr. L. W. Garner
INPO