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Carolina Power & Light Company

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
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NRC INSPECTION REPORT NO. 50-261/89-03 RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this response to the Notice of Violation initiated by NRC Inspection Report No. 50-261/89-03.

This reply to the Notice of Violation was originally due to the NRC by April 10, 1989. The Notice of Violation did not reach the appropriate plant personnel in a timely manner due to an isolated lapse in an informal, but thus far reliable, internal distribution system.

Actions have been taken to ensure that these personnel receive this correspondence via a more formal correspondence distribution system.

SEVERITY LEVEL IV VIOLATION (RII-89-03-02-SL4)

Technical Specification 6.5.1.1.1.c. requires procedures be implemented for surveillance and test activities of safety-related equipment. Operations Surveillance Test OST-162, Emergency Diesel Generator Auto Start on Loss of Power and Safety Injection, is established to demonstrate Technical Specification required surveillance test 4.6.1.2.

Contrary to the above, written procedure OST-162 was not adequately implemented on January 24, 1989, in that safety-related valves SI-867 A and B were in the OPEN position instead of the CLOSED position as specified by steps 7.1.7.1. and 7.1.7.2 of OST-162.

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REPLY

1. Admission or Denial of the Violation

CP&L acknowledges the violation.

2. Reason for the Violation

The violation occurred due to the failure of plant personnel to properly implement the procedural requirements of OST-162. However, a contributing factor to the violation was the concurrent performance of a related refueling interval test, OST-163, Safety Injection Test. Performance of OST-162 and OST-163 is required to satisfy the Technical Specifications. These tests have similar personnel and instrumentation requirements, and are similar in nature and scope. Due to these similarities, and to minimize their impact on other outage-related activities, these tests have routinely been performed as one evolution. The relationship between these tests and their concurrent performance may have created the misconception that these procedures were specifically written to be compatible and complementary. However, each procedure is written to stand alone; the performance of one test does not necessarily leave plant equipment aligned for performance of the other test. In this instance, the initial conditions for OST-162 and OST-163 were performed concurrently and valves SI-867 A and B were verified in the CLOSED position. However, during performance of OST-163 these valves are OPENED, and are verified OPEN (normal position) following completion of the test. This resulted in valves SI-867 A and B being improperly aligned for the subsequent performance of OST-162.

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

Valves SI-867 A and B were immediately closed in accordance with the initial conditions of OST-162. Also, all other RTGB-operated valves identified in the initial conditions of OST-162 were verified to be in their required positions.

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

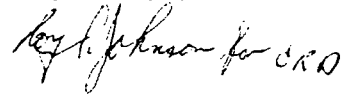
The Manager - Operations is conducting individual meetings with all shift operating crews. As part of each meeting, the requirement for strict procedure compliance is emphasized and discussed. Also, Operations personnel will review and upgrade OST-162 and OST-163 prior to their performance during the next refueling outage.

5. Date When Full Compliance Will Be Achieved

OST-162 and OST-163 will be revised prior to their performance during the next refueling outage which is currently scheduled to begin in April 1990.

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

Very truly yours,



C. R. Dietz
Manager

Robinson Nuclear Project Department

CTB:bah

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO