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SUBJECT: Forwards response to NRC 960312 ltr re violations noted in
 insp rept 50-261/96-300. Corrective actions: counseled
 operations unit mgt.

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APR 11 1996

C. S. Hinnant
Vice President
Robinson Nuclear Plant

Robinson File No: 13510E
Serial: RNP-RA/96-0072

United States 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. 50-261/96-300
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

This provides the Carolina Power & Light (CP&L) Company reply to the Notice of Violation identified in NRC Inspection Report No. 50-261/96-300 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated March 12, 1996. The Violation involves a failure to take adequate corrective action to correct a procedural deficiency that had been previously identified. As requested in the letter transmitting the Notice of Violation, the enclosure restates the Violation, followed by our reply. This reply is required to be submitted to the NRC by April 11, 1996.

Should you have any questions regarding this matter, please contact Mr. R. M. Krich at (803) 857-1802.

Very truly yours,

C. S. Hinnant
C. S. Hinnant
Vice President

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Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

REPLY TO A NOTICE OF VIOLATION

Violation

10 CFR 50 Appendix B Criterion XVI states, in part 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 properly 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.

Contrary to the above, on February 13, 1995, the inspector identified where the licensee failed to take adequate corrective action to correct a deficiency previously identified, on July 16 and August 24, 1995, by the facility, in AOP-14, "CCW System Malfunction." This deficiency was identified twice by the facility training department to be inadequate in that if R-17, "CCW Radioactive Liquid," was in alarm, one could not enter the RNO column without exercising the procedural loop criteria in paragraph 5.3.1.6 of OMM-022, "EOP Users Guide," in order to address non-regenerative heat exchanger leakage.

Reply

Carolina Power & Light (CP&L) agrees that the violation occurred as described.

1. The Reason for the Violation

This violation was caused by personnel error. Operations Unit management failed to adequately implement corrective action processes established for identification, tracking, and dispositioning concerns identified with procedures. Consequently, the deficiency identified during 1995 in procedure Abnormal Operating Procedure (AOP)-014, "CCW System Malfunction," was not resolved in a timely manner. During July and August 1995, plant Training Section personnel identified a deficiency in procedure AOP-014. Although an adequate means existed for the operators to successfully accomplish the intent of the procedure, this deficiency was properly documented, and provided to the Operations Unit for resolution. During this time, Operations Unit management was planning improvements to the process established for resolving concerns with procedures assigned to the Operations Unit, and the documentation identifying the concern with AOP-014 was delayed pending implementation of this improved system. In January 1996, this concern was again identified by Training Section personnel; however, with the knowledge that the concern had been previously identified and that there was an established method to accomplish the procedure objective, no followup communication to the Operations Unit was initiated.

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

Operations Unit management responsible for delaying the resolution of the concern with procedure AOP-014 was counseled, and clearly understands that delaying necessary procedure changes will not be tolerated.

Procedure AOP-014 was revised and implemented on February 28, 1996, to correct the deficiency. Other identified and documented concerns with Operations Unit procedures were reviewed and were properly assigned for action. No deficiencies that required immediate attention were found.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

The process previously established for tracking and dispositioning Operations Unit procedural deficiencies was unique to the Operations Unit. This process has now been improved to ensure that change requests are evaluated and prioritized promptly, and the changes are made in accordance with this prioritization.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the improvement of the procedure corrective action process.