



Carolina Power & Light Company

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APR 3 1985

Robinson File No: 13510E

Serial: RNPDP/85-665

Dr. J. Nelson Grace, Regional Administrator  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W., Suite 3100  
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
REGION II INSPECTION REPORT 84-53

Dear Dr. Grace:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response. As requested in the cover letter of the subject report, particular attention has been given to address Operations staff improvements made to ensure the Control Room Supervisor's awareness of Plant activities. This concern has been addressed in the response to Part b of the violation.

Severity Level IV Violation, RII-84-53-01-SL4

H. B. Robinson Technical Specifications Paragraph 6.5.1.1.1 requires that written procedures shall be established, implemented, and maintained for shift relief turnover and surveillance and test activities of safety-related equipment.

- a. OMM-008, (Revision 10), Minimum Equipment List, and OMM-002, (Revision 4), Fire Protection Manual, require specific actions be conducted during shift turnover.

Contrary to the above, OMM-008 and OMM-002 were not implemented in that:

- (1) On December 20 and 31, 1984, the off-going Shift Foreman incorrectly concurred that shift turnover was complete.
- (2) On December 20 and 31, 1984, and again on January 1 and 2, 1985, the on-coming Auxiliary Operators failed to complete the minimum equipment list checks prior to shift turnover.

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(3) On January 1, 1985, the on-going Shift Foreman failed to ensure the availability of at least five shift fire brigade members (Technical Specification 6.2.3.g).

- b. OST-353, (Revision 1), Containment Spray System Component Testing requires in Step 7.1.3.2 that valve SI-891A be cycled closed.

Contrary to the above, OST-353 was not correctly implemented in that on January 2, 1985, valve SI-891C was cycled open instead of SI-891A/closed, resulting in partial draining of the pressurizer.

#### Response

##### 1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

The response to this violation has been separated into 3 parts in order to be specific in the reasons for the violation and the corrective steps taken.

##### First Part of the Violation

- a.(1) On December 20 and 31, 1984, the off-going Shift Foreman incorrectly concurred that shift turnover was complete.

##### Reason for the Violation

The cause of the violation was the efforts of the off-going Shift Foreman to expedite shift turnover by completing his portion of the turnover paperwork early.

##### Corrective Steps Which Have Been Taken

To prevent recurrence, a copy of the administrative sections of the Minimum Equipment List (MEL), OMM-008, was routed to the Shift Foremen and the other licensed operators. The responsibilities of each person during the turnover process, including when each individual should sign for completing his responsibilities, were highlighted.

##### Corrective Steps Which Will be Taken

The above corrective action should prevent recurrence of this part of this violation.

##### Date When Full Compliance Will be Achieved

Full compliance has been achieved with this part of the violation.

Second Part of the Violation

- a.(2) On December 20 and 31, 1984, and again on January 1 and 2, 1985, the on-coming Auxiliary Operators failed to complete the minimum equipment list checks prior to shift turnover.
- a.(3) On January 1, 1985, the on-going Shift Foreman failed to ensure the availability of at least five shift fire brigade members (Technical Specification 6.2.3.g).

Reason for the Violation

The cause of the violation was the addition of new sections to the Minimum Equipment List (MEL) over the years without adequately revising the administrative portions of the MEL itself and the Shift Foreman's responsibilities in the administrative procedures. For example, sections were added to the MEL to guide shift turnover for the Senior Control Operator (SCO) and the two Control Operators (CO). The intent and practice resulting from adding these sections were to guide the turnovers of the SCOs and COs with the Shift Foreman having a review function after everyone (including the Shift Foreman) had completed their turnovers. Other examples are Section 6.11 (RTGB Control Operator Channel and Miscellaneous Checks) and Section 6.12 (Auxiliary Operator Miscellaneous Checks) of the MEL. These sections were added to provide a controlled location for the documentation of Technical Specification required checks and were intended to be performed at some time during each shift but not necessarily as part of shift turnover.

Therefore, differences developed between actual shift turnover practice and the written administrative directions for shift turnover which resulted in parts a.(2) and a.(3) of this violation.

Corrective Steps Which Have Been Taken

The administrative directions in OMM-008, Minimum Equipment List, have been updated to eliminate the discrepancies between the directions and the intent of each section of the MEL. The sections of the MEL which must be completed prior to a shift turnover and who must complete them have been specified.

Corrective Steps Which Will be Taken

Further review has determined that additional procedure updates are necessary to reflect the desired shift turnover practices. OMM-002, Fire Protection Manual, will be revised to clarify the Fire Protection Shift Technical Aide turnover process. The duties and responsibilities of the Shift Foreman (now located in Section 5.5.2 of AP-001, Project Organization and Responsibilities) will also be updated.

Date When Full Compliance Will be Achieved

Full compliance with this part of the violation will be achieved when the revisions to OMM-002 and AP-001 are complete. These revisions will be completed by May 10, 1985.

Third Part of the Violation

- b. OST-353 (Revision 1), Containment Spray System Component Testing, requires in Step 7.1.3.2 that valve SI-891A be cycled closed.

Contrary to the above, OST-353 was not correctly implemented in that on January 2, 1985, valve SI-891C was cycled open instead of SI-891A/closed, resulting in partial draining of the pressurizer.

Reason for the Violation

At the time of this event, a Plant heatup was in progress, and the Control Room Operators were preparing to secure from RHR cooling.

There were two causes of this event. The first was the failure of the Auxiliary Operator to have a copy of the procedure with him in the contaminated area for reference. The second cause was the failure of the Senior Control Operator to give adequate consideration to the Auxiliary Operator's question when the Auxiliary Operator initially questioned whether or not he should have flow through the valve he was cycling. Had the Auxiliary Operator been able to review the procedure in the contaminated area, he would have realized he should have been shutting a normally open valve vice, opening a normally closed valve, and that the valve number he was trying to cycle did not agree with the valve specified in the procedure. Had the Senior Control Operator referred to the procedure, the system drawing, and questioned the Auxiliary Operator more closely regarding the valve numbers, the event could also have been prevented.

Corrective Steps Which Have Been Taken

Immediately after this event, the Unit 2 Operating Supervisor thoroughly discussed it with the Auxiliary Operator, Senior Control Operator, and Shift Foreman who were directly involved in the event. The steps each one of them could have taken to prevent the event were thoroughly discussed.

A summary of the sequence of the event was also prepared. Each Shift Foreman then reviewed the event with the personnel on his shift. This review also included a discussion of what could have been done to prevent the event. The preventive measures discussed included:

- a) The need for the Auxiliary Operator to take a copy of the procedure with him into the contaminated area.



- b) The need for Control Room personnel to refer to the procedure and/or other documents such as drawings when discussing questions raised during the performance of an evolution.
- c) The need for the Shift Foreman to ensure that the personnel performing an evolution thoroughly understand the evolution prior to giving his permission to perform it.

This review of the event by each Shift Foreman started with the next shift after the event occurred and has been completed.

In addition, five meetings have been held with most of the Operators attending one of the meetings. Various topics were discussed, with the following operating principles stressed.

- a) Procedure compliance
- b) The importance of thorough Plant tours
- c) Attention to detail
- d) The importance of maintaining a high standard of operating excellence
- e) Professionalism

Since these five meetings were not specific to this event, they have not been documented.

#### Corrective Steps Which Will be Taken

Additional corrective actions and actions to ensure the Control Room Supervisors remain cognizant of on-going activities and control Plant evolutions will include the following.

- a) Additional meetings will be held with all shift operating personnel to discuss procedural compliance, attention to detail, and the need to closely control Plant evolutions in progress. These meetings will be completed by May 31, 1985.
- b) A discussion of the details of this event and its significance will be included in the 1985 Operator retraining.
- c) The event will be reviewed by the Training Unit to determine if it should be included in each initial operator training program. This review will be completed by July 31, 1985.
- d) The Robinson Plant, Unit 2, Operating Unit's Administrative Procedures will be reviewed and revised if necessary. This review will ensure adequate written guidance exists to stress the need for

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having a copy of the procedure readily available when performing an evolution. It will also ensure adequate guidance exists for properly handling questions raised while an evolution is in progress. This review and any revision necessary will be complete by May 31, 1985.

Date When Full Compliance Will be Achieved

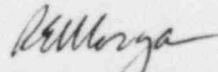
The additional meeting with shift operating personnel will be completed by May 31, 1985.

The Training Unit will review the event and determine its applicability to the initial operator training program by July 31, 1985.

The Operations Administrative Procedures will be reviewed and applicable revisions made by May 31, 1985.

If you have any questions concerning this response, please contact Mr. David C. Stadler at (803) 383-4524, Extension 363.

Very truly yours,



R. E. Morgan  
General Manager

H. B. Robinson S. E. Plant

CLW:sr/C-552

cc: H. E. P. Krug  
Document Control Desk