UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

January 26, 2005

Carolina Power and Light Company
ATTN: Mr. John Moyer
Vice President - Robinson Plant
H. B. Robinson Steam Electric Plant
Unit 2
3851 West Entrance Road
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT - NRC INTEGRATED INSPECTION REPORT 05000261/2005005

Dear Mr. Moyer:

On December 31, the US Nuclear Regulatory Commission (NRC) completed an inspection at your H.B. Robinson reactor facility. The enclosed integrated inspection report documents the inspection findings, which were discussed on January 5, 2006, with **Bill Noll** and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. On the basis of the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Paul E. Fredrickson, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Docket No.: 50-261
License No.: DPR-23

Enclosure: Inspection Report 05000261/2005005
w/Attachment: Supplemental Information

cc w/encl: (See page 2)

cc w/encl:
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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No:	50-261
License No:	DPR-23
Report No:	05000261/2005005
Facility:	H. B. Robinson Steam Electric Plant, Unit 2
Location:	3581 West Entrance Road Hartsville, SC 29550
Dates:	October 1, 2005 - December 31, 2005
Inspectors:	R. Hagar, Senior Resident Inspector D. Jones, Resident Inspector A. Hutto, Resident Inspector, Oconee (Sections 1R01, 1R05) R. Hamilton, Senior Health Physicist (Sections 2OS1, 2OS2, 4OA1, 4OA5) J. Lenahan, Senior Reactor Inspector (Section 1R08)
Approved by:	P. Fredrickson, Chief Reactor Projects, Branch 4 Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000261/2005-005, 10/01/2005-12/31/2005; H.B. Robinson Steam Electric Plant, Unit 2; Routine Integrated Report.

The report covered a three month period of inspection by resident inspectors and an announced inspection by a regional senior health physicist inspector, and a senior reactor inspector. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, “Reactor Oversight Process,” Revision 3, dated July 2000.

A. NRC-Identified and Self-Revealing Findings

None.

B. Licensee-Identified Violations

None.

Enclosure

REPORT DETAILS

Summary of Plant Status The unit began the inspection period shut down for a refueling outage. The reactor was restarted on October 25, and the unit was returned to full power on October 29. The unit remained at full power for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection

a. Inspection Scope

After the licensee completed preparations for seasonal low temperature, the inspectors walked down the refueling water storage tank and the main steam line header pressure transmitters. These systems were selected because their safety related functions could be affected by adverse weather. The inspectors reviewed work requests and observed plant conditions and cold weather mitigation equipment for both systems. The inspectors reviewed documents listed in the Attachment, observed plant conditions, and evaluated those conditions using criteria documented in Procedure **AP-008, Cold Weather Preparations.**

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. Inspection Scope

Partial System Walkdowns:

The inspectors performed the following three partial system walkdowns, while the indicated structures, systems, and/or components (SSCs) were out-of-service for maintenance and testing:

System Walked Down	SSC Out-of-Service	Date Inspected
A emergency diesel generator (EDG)	B EDG	November 9
A and B train auxiliary feedwater system	Steam driven auxiliary feedwater pump	November 21
B EDG	A EDG	December 20

To evaluate the operability of the selected trains or systems under these conditions, the inspectors compared observed positions of valves, switches, and electrical power breakers to the procedures and drawings listed in the Attachment.

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

For the five areas identified below, the inspectors reviewed the control of transient combustible material and ignition sources, fire detection and suppression capabilities, fire barriers, and any related compensatory measures to verify that those items were consistent with Updated Final Safety Analysis Report (UFSAR) Section 9.5.1, Fire Protection System, and UFSAR Appendix 9.5.A, Fire Hazards Analysis. The inspectors walked down accessible portions of each area and reviewed results from related surveillance tests to verify that conditions in these areas were consistent with descriptions of the areas in the UFSAR. Documents reviewed are listed in the Attachment.

The following areas were inspected:

Fire Zone	Description
20	E-1/E-2 electrical switchgear room
7	Auxiliary building hallway (ground floor)
22	Control room
1	B EDG room
29	Service water pump area

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance

a. Inspection Scope

The inspectors reviewed the inspection results of the B motor driven auxiliary feedwater pump lube oil heat exchanger to verify that the results were appropriately categorized against the pre-established acceptance criteria described in Procedure CM-201, Safety Related and Non-Safety Related Heat Exchanger Maintenance. The inspectors also verified that the frequency of the inspection was sufficient to detect degradation prior to loss of heat removal capability below design basis values. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

1R08 Inservice Inspection Activities

a. Inspection Scope

The inspectors reviewed inservice inspection ISI procedures, observed in-process ISI work activities, and reviewed selected ISI records. The observations and records were compared to the Technical Specifications (TS) and the applicable Code (ASME Boiler and Pressure Vessel Code, Section XI, 1995 Edition, 1996 Addenda) to verify compliance and to ensure that examination results were appropriately evaluated and dispositioned.

The inspectors observed the following non-destructive examination (NDE) activities. areas:

- Liquid penetrant (PT) examination of loop B mainsteam line elbow to pipe weld C-F-2/C5.51,
- Visual inspection of pipe hanger (spring can) CON2-S29-14, main steam support MS-1B-1005,
- Visual inspection of valve RC-551B valve and flange bolting,
- Ultrasonic examination (UT) of tubesheet to head weld number 105A/01 on Steam Generator B.

The UT exams performed on weld number 105A/01 verified previously recorded indications. In addition, the inspectors examined snubbers, spring cans and pipe supports during a walkdown of the Unit 2 containment.

The inspectors reviewed records of the above inspections including calibrations, equipment certifications, consumable certifications, and personnel qualifications.

The inspectors also reviewed records documenting welding activities associated with Work Orders (WO) 00664066, Replace Check Valve SI-873B and WO 00664068, Replace Check Valve SI-873A for the replacement of Class 2 valves on the safety injection system. The inspectors also reviewed WO 00759301 for replacement of PCV-455A, a Class 1 valve in the reactor coolant system. The records were reviewed to verify that the welding process and examinations were performed in accordance with ASME Section XI repair/replacement requirements. The inspectors reviewed drawings, work instructions, weld process sheets, and weld travelers.

The inspectors reviewed implementation of the Boric Acid Corrosion Control Program to verify that commitments made in response to Generic Letter 88-05 and Bulletin 2002-01 were being effectively implemented. The inspectors reviewed a summary of boric acid leakage screening reports, evaluations, work orders, and corrective actions. The inspectors examined various components during walkdowns inside the containment to verify the leaks were properly assessed and corrective actions were implemented.

A sample of ISI issues in the licensee's corrective action program were reviewed to confirm that problems were being identified and placed in the corrective action program, and appropriate corrective actions were being initiated. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

On November 22, the inspectors observed licensed-operator performance during requalification simulator training for crew 4 to verify that operator performance was consistent with expected operator performance, as described in Operations Training Full Scope Scenario, LOCT-SEG-05-3 dated 11/10/05. This training tested the operators' ability to respond to the failure of a pressure transmitter, a stuck open pressurizer relief valve, a reactor coolant pump seal failure and a loss of coolant accident. The inspectors focused on clarity and formality of communication, the use of procedures, alarm response, control board manipulations, group dynamics, and supervisory oversight.

The inspectors observed the post-exercise critique to verify that the licensee identified deficiencies and discrepancies that occurred during the simulator training.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness

a. Inspection Scope

The inspectors reviewed Action Request (AR) 162642, Dedicated Shutdown Diesel Output Breaker Failed to Close, to verify the appropriate handling of this performance problem in accordance with 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, and 10 CFR 50.65, Maintenance Rule. Documents reviewed are listed in the Attachment.

During the reviews, the inspectors focused on the following:

- Appropriate work practices,
- Identifying and addressing common cause failures,
- Scoping in accordance with 10 CFR 50,65(b),
- Characterizing reliability issues (performance),
- Charging unavailability (performance),
- Trending key parameters (condition monitoring),
- 10 CFR 50,65(a)(1) or (a)(2) classification and reclassification, and

- Appropriateness of performance criteria for SSCs/functions classified (a)(2) and/or appropriateness and adequacy of goals and corrective actions for SSCs/functions classified (a)(1).

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation

a. Inspection Scope

For the three time periods listed below, the inspectors reviewed risk assessments and related activities to verify that the licensee performed adequate risk assessments and implemented appropriate risk-management actions when required by 10 CFR 50.65(a)(4) and as specified by Procedure OMM-048, Work Coordination and Risk Assessment. For emergent work, the inspectors also verified that any increase in risk was promptly assessed, and that appropriate risk-management actions were promptly implemented. Those periods included the following:

- The work week from November 4 - 11, including scheduled work in the switchyard and on one EDG
- The work week from November 12 - 18, including scheduled work on the B service water train and emergent work on the A component cooling water pump
- The work week from December 12 - 16, including scheduled work on the A and B component cooling water pumps and emergent work on the B service water booster pump

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the operability determination associated with AR 170576. This AR addressed the operability of the B main steam line after that line was struck during a refueling outage by a jib crane. The inspectors assessed the accuracy of the evaluation and compliance with the TS. The inspectors reviewed the operability determination against the criteria specified by Procedure PLP-102, Operability Determinations. The inspectors compared the justifications provided in the determination to the requirements from the TS and the UFSAR to verify that operability was properly justified and the main steam line and its associated instruments remained available, such that no unrecognized increase in risk occurred. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

1R16 Operator Work-Arounds

a. Inspection Scope

The inspectors reviewed Work-Around 05-09, Place [Loose Parts Monitoring System] in Disable on the [Reactor Turbine Gage Board] Prior to Moving Control Rods, to verify that this workaround did not affect either the functional capability of the related system in responding to an initiating event, or the operators' ability to implement abnormal or emergency operating procedures.

The inspectors reviewed the cumulative effects of the three operator workarounds that were in place on December 22, listed below. This review was to verify that the effects could not increase an initiating event frequency, affect multiple mitigating systems, or affect the ability of operators to respond in a correct and timely manner to plant transients and accidents. Documents reviewed are listed in the Attachment.

- 05-09, Place [Loose Parts Monitoring System] in Disable on the [Reactor Turbine Gage Board] Prior to Moving Control Rods
- 05-11, South Service Water Strainer Blows down Continuously When Left in the Intermittent Position
- 05-12, Pressure Control Valve (PCV-1380) Is Not Operating Properly Therefore Valve MS-61 Is Throttled

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

For the five post-maintenance tests listed below, the inspectors witnessed the test and/or reviewed the test data to verify that test results adequately demonstrated restoration of the affected safety functions described in the UFSAR and TS. Documents reviewed are listed in the Attachment.

Test Procedure	Title	Related Maintenance Activity	Date Inspected
OST-930	Control System Component Test for PCV-455C and PCV-456	Installation of new pressurizer power-operated relief valve key-locked isolation switches	October 11
OST-918	Dedicated Shutdown Equipment and Instrumentation Check (Monthly)	Replacement of component coolant water flow indicator (FI-660)	October 13
OST-409-1	[EDG] A Fast Speed Start	Replacement of governor and low-speed relay	October 13
OST-207	Comprehensive Flow Test for the Motor Driven Auxiliary Feedwater Pumps	Inspection and repair of auxiliary feedwater valves V2-20A and V2-20B	October 19
OST-303-2	Service Water Booster Pump B Test	Replacement of rotating assembly	December 12

b. Findings

No findings of significance were identified.

1R20 Refueling and Outage Activities

For the refueling outage that was ongoing at the beginning of the inspection period and ended on October 28, the inspectors evaluated licensee outage activities as described below to verify that the licensee appropriately considered risk while implementing the outage schedule, adhered to administrative risk reduction methodologies developed to control plant configuration, and adhered to operating license and technical specification requirements that maintained defense-in-depth. Documents reviewed are listed in the Attachment.

Mitigating Strategies

The inspectors reviewed licensee mitigation strategies for losses of the following key safety functions:

- decay heat removal
- inventory control
- power availability

- reactivity control
- containment

Licensee Control of Outage Activities

During the outage, the inspectors observed the items or activities described below to verify that the licensee maintained defense-in-depth commensurate with the outage risk-control plan for key safety functions and applicable TS requirements when taking equipment out-of-service.

- Clearance Activities
- Reactor Coolant System Instrumentation
- Electrical Power
- Decay Heat Removal (DHR)
- Spent Fuel Pool Cooling
- Inventory Control
- Reactivity Control
- Containment Closure

The inspectors also reviewed responses to emergent work and unexpected conditions to verify that resulting configuration changes were controlled in accordance with the outage risk control plan, and to verify that control room operators were kept cognizant of the plant configuration.

Refueling Activities

The inspectors observed fuel handling operations (reconstitution and insertion) and other ongoing activities to verify that those operations and activities were being performed in accordance with TS requirements and approved procedures. Also, the inspectors observed refueling activities to verify that the location of the fuel assemblies was tracked, including new fuel, through core reload.

Monitoring of Heatup and Startup Activities

Prior to mode changes and on a sampling basis, the inspectors reviewed system lineups and/or control board indications to verify that TS requirements, license conditions, and other requirements, commitments, and administrative procedure prerequisites for mode changes were met prior to changing modes or plant configurations. Also, the inspectors periodically reviewed reactor coolant system (RCS) boundary leakage data, and observed the setting of containment integrity to verify that the RCS and containment boundaries were in place and had integrity when necessary. Prior to reactor startup, the inspectors walked down containment to verify that debris has not been left which could affect performance of the containment sumps. In addition, the inspectors reviewed reactor physics testing results to verify that core operating limit parameters were consistent with the design.

Identification and Resolution of Problems

Periodically, the inspectors reviewed the items that had been entered into the CAP to verify that the licensee had identified problems related to outage activities at an appropriate threshold and had entered them into the Corrective Action Program (CAP).

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

For the six surveillance tests listed below, the inspectors witnessed testing and/or reviewed the test data to verify that the SSCs involved in these tests satisfied the requirements described in the TS, the UFSAR, and applicable licensee procedures, and that the tests demonstrated that the SSCs were capable of performing their intended safety functions. Documents reviewed are listed in the Attachment.

Test Procedure	Title	Date Inspected
MST-025	Emergency Bus E-2 Undervoltage and Load Shed Test (Refueling Shutdown), Revision	October 4
EST-023	Control Room Emergency Ventilation System (Once Per 18 Months, 720 Hours of Operation, & Filter Change)	October 2 - 7
EST-137*	Local Leak Rate Test of Mechanical Penetration Sleeves, Radiation Monitoring Valves, Station Air Valves, Purge Exhaust Valves, Pressure Relief and Post-accident Venting Valves (Refueling Shutdown or Other Convenient Interval Not to Exceed 2 Years)	October 7
OST-253**	Comprehensive Flow Test for the [Residual Heat Removal] Pumps	October 9
EST-050	Refueling Start-Up Procedure	October 24
OST-051***	Reactor Coolant System Leakage Evaluation	December 23

* This procedure included testing of a large containment isolation valve.
**This procedure included inservice testing requirements.
*** This procedure was a Reactor Coolant System leakage detection surveillance.

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors reviewed the temporary modification described in Engineering Change 62809, Repair Steam Leak on C [Main Steam Isolation Valve] to verify that the modification did not affect the safety functions of important safety systems, and to verify that the modification satisfied the requirements of Procedure EGR-NGGC-005, Engineering Change, and 10 CFR 50, Appendix B, Criterion III, Design Control. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation

a. Inspection Scope

The inspectors reviewed the results of the November 8, emergency preparedness drill to verify licensee self-assessment of classification, notification, and protective action recommendation development in accordance with 10CFR50, Appendix E. The inspectors also reviewed the post-drill critique documents and applicable ARs to verify that the licensee properly identified and entered into the Corrective Action Program, the drill deficiencies as required by 10CFR50.47. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control to Radiologically Significant Areas

a. Inspection Scope

Access Control

Licensee activities for monitoring workers and controlling access to radiologically significant areas were inspected. The inspectors evaluated procedural guidance and directly observed implementation of administrative and physical controls; appraised radiation worker and technician knowledge of, and proficiency in implementing, Radiation Protection (RP) Program activities; and assessed worker exposures to radiation and radioactive material.

The inspectors reviewed quarterly area thermoluminescence dosimeter (TLD) results for the previous four quarters to assess the impact of the new independent spent fuel storage installation storage on site doses. The doses for the current quarter were not available and it would be the first full quarter with the modules loaded. The perimeters of both independent spent fuel storage installations (ISFSIs) were walked down to verify adequate postings and placement of area TLDs. Dose rates were taken at the high radiation boundaries around the cooling vents on the new casks to verify adequacy of postings.

Radiological postings and material labeling were directly observed during tours of the containment building, auxiliary building, radwaste processing area, yard and ISFSIs . The inspectors conducted independent surveys in these areas and compared the results to licensees documented surveys that were provided for workers to reference. During plant tours, control of locked high radiation area (LHRA) keys and the physical status of LHRA doors were examined. In addition, the inspectors observed radiological controls for non-fuel items stored in the spent fuel pools. The inspectors also reviewed selected RP procedures and radiation work permits (RWPs), and discussed current access control program implementation with RP supervisors.

During the inspection, radiological controls for work activities in high radiation areas (HRA) were observed and discussed. The inspectors attended an RP pre-job planning meeting for removal of the old reactor head, its movement to the mausoleum and directly observed the work activities involved. The inspectors observed workers' adherence to RWP guidance and radiation protection technician (RPT) proficiency in providing job coverage. This included the coverage of work in an HRA that was outside the normal radiologically controlled area and under inclement weather conditions. The inspectors evaluated dose controls, contamination controls and radioactive material control in a satellite radiologically controlled area. Work included application of contingency actions while entombing the old reactor head. Controls for limiting exposure to airborne radioactive material were reviewed and operation of ventilation units and positioning of air samplers were also observed in containment and auxiliary buildings. The inspectors evaluated electronic dosimeter alarm setpoints for consistency with radiological conditions in and around the containment, auxiliary building and radwaste processing areas. In addition, the inspectors interviewed workers to assess knowledge of RWP requirements.

The inspectors evaluated worker exposures through review of data associated with discrete radioactive particle and dispersed skin contamination events. Controls used for monitoring extremity doses and the placement of dosimetry when work involved significant dose gradients were reviewed.

Radiation Protection Program activities were evaluated against 10 CFR Part 20; Regulatory Guide 8.38, Control of Access to High and Very High Radiation Areas in Nuclear Power Plants; and approved licensee procedures. Licensee guidance documents, records, and data reviewed are listed in the Attachment.

Problem Identification and Resolution.

Eight ARs associated with radiological controls, personnel monitoring, and exposure assessments were reviewed and discussed with RP supervisors. The inspectors assessed the licensee's ability to identify, characterize, prioritize, and resolve the identified issues in accordance with Procedure CAP-NGGC-0200, Corrective Action Program, Rev. 16. Specific documents reviewed are listed in the Attachment. The inspectors completed 21 of the required 21 samples.

b. Findings

No findings of significance were identified.

2OS2 ALARA Planning and Controls

a. Inspection Scope

As Low As Reasonably Achievable (ALARA)

Implementation of the licensee's ALARA program during Fall 2005 was observed and evaluated by the inspectors. The inspectors reviewed ALARA planning, dose estimates, and prescribed ALARA controls for outage work tasks expected to incur the maximum collective exposures. Incorporation of planning, established work controls, expected dose rates, and dose expenditure into the ALARA pre-job briefings and RWPs for those activities were also reviewed. The inspectors observed workers erecting a permanent LHRA boundary inside containment, shielding the old reactor vessel head, removal of interferences, seal table work and preparation of the old reactor vessel head for transport while evaluating the licensee's use of engineering controls, low-dose waiting areas, and on-the-job supervision. Where practical, the inspectors observed the use of closed circuit TV and telemetry monitoring to reduce overall exposure for the job.

Selected elements of the licensee's source term reduction and control program were examined to evaluate its effectiveness in supporting ALARA goals. Shutdown chemistry program implementation and the resultant effect on the containment and auxiliary buildings dose rate trending data were reviewed and discussed with cognizant licensee representatives.

Trends in individual and collective personnel exposures at the facility were reviewed. Trends in the plant's three-year rolling average collective exposure history, outage, non-outage and total annual doses for selected years were reviewed and discussed with licensee representatives.

The licensee's ALARA program implementation and practices were evaluated for consistency with UFSAR Chapter 12, Radiation Protection; 10 CFR Part 20 requirements; and licensee procedures. Documents reviewed during the inspection of this program area are listed in the Attachment.

Problem Identification and Resolution

The inspectors reviewed the corrective action documents listed in the Attachment that were related to the licensee's ALARA program. The inspectors assessed the licensee's ability to identify, characterize, prioritize, and resolve the identified issues in accordance with Procedure CAP-NGGC-0200, Corrective Action Program, Rev. 16.

The inspector completed five additional samples for their inspection procedure as part of inspection initiative to review ALARA controls for the reactor head replacement.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

Cornerstone: Occupational Radiation Safety

- Occupational Exposure Control Effectiveness

The inspectors sampled licensee records to verify the accuracy of reported Performance Indicator (PI) data for the period listed below. To verify the accuracy of the reported PI elements, the reviewed data were assessed against guidance contained in NEI 99-02, "Regulatory Assessment Indicator Guideline," Rev. 3, and the PI Frequently Asked Questions (FAQ) list.

The inspectors reviewed the Occupational Exposure Control Effectiveness PI results for the period of September 2004 through September 2005. For the assessment period, the inspectors interviewed several individuals and reviewed corrective action documents. Section 2OS1 contains additional details regarding the inspection of controls for exposure significant areas and review of related corrective action documents. Documents reviewed are listed in the Attachment. The inspector completed one of two required samples.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems

.1 Routine Review of ARs

To aid in the identification of repetitive equipment failures or specific human performance issues for followup, the inspectors performed frequent screenings of items entered into the CAP. The review was accomplished by reviewing daily ARs.

.2 Annual Sample Review

a. Inspection Scope

The inspectors selected AR 140413, [Nuclear Assessment Section] Issue R-TQ-04-01-I1 [Nuclear Condition Report] Investigations for detailed review. The inspectors selected this AR because it related specifically to the cross-cutting area of problem identification and resolution. The inspectors reviewed this report to verify:

- complete and accurate identification of the problem in a timely manner;
- evaluation and disposition of performance issues;
- evaluation and disposition of operability and reportability issues;
- consideration of extent of condition, generic implications, common cause, and previous occurrences;
- appropriate classification and prioritization of the problem;
- identification of root and contributing causes of the problem;
- identification of corrective actions which were appropriately focused to correct the problem; and
- completion of corrective actions in a timely manner.

The inspectors also reviewed this AR to verify compliance with the requirements of the CAP as delineated in Procedure CAP-NGGC-0200 and 10 CFR 50, Appendix B. Documents reviewed are listed in the Attachment.

b. Findings and Observations

No findings of significance were identified.

.3 Semi-Annual Trend Review

a. Inspection Scope

The inspectors performed a review of the CAP and associated documents to identify trends that could indicate the existence of a more significant safety issue. The inspector's review focused on repetitive equipment issues, licensee trending efforts, licensee human performance results, and also considered the results of daily inspector

CAP item screening as discussed in Section 4OA2.1. The inspector's review nominally considered the six month period of July, 2005, through December, 2005, although the review expanded beyond those dates when the extent of a potential trend warranted. The review included issues documented outside the normal CAP in major equipment problem lists, repetitive and/or rework maintenance lists, departmental problem/challenges lists, system health reports, quality assurance audit/surveillance reports, self assessment reports, and Maintenance Rule assessments. The inspectors compared and contrasted their results with the results contained in the latest licensee monthly and quarterly trend reports. Corrective actions associated with a sample of the issues identified in the trend reports were reviewed for adequacy. The specific documents reviewed are listed in the Attachment.

The inspectors also evaluated the trend reports against the requirements of the CAP as specified in 10 CFR 50, Appendix B, Criterion XVI, and in Procedures CAP-NGGC-0200, Corrective Action Program, and CAP-NGGC-0206, Corrective Action Program Trending and Analysis.

b. Assessment and Observations

No findings of significance were identified. The inspectors evaluated trending methodology and observed that the licensee had performed a detailed review. The licensee routinely reviewed cause codes, involved organizations, key words, and system links to identify potential trends in the CAP data. The inspectors compared the licensee process results with the results of the inspectors' daily screening, and did not identify any discrepancies or potential trends in the CAP data that the licensee had failed to identify.

4OA5 Other Activities

.1 Reactor Vessel Head Replacement Inspection (IP 71007)

a. Inspection Scope

The Inspectors reviewed the ALARA work plan for the reactor vessel head replacement. The review included job dose estimates, broken down into individual tasks, exposure controls including temporary shielding, controls for airborne and surface contamination, radioactive materials controls and management, emergency contingencies and expected radiological source term. The inspectors observed portions of disassembly, shielding, wrapping and preparation for movement of the old reactor head. The inspectors observed the placement of the old reactor head into its storage tomb. The inspectors assessed the adequacy of radiological controls, staffing, and competence of the RPTs providing coverage for the movement and internment of the old reactor vessel head.

b. Findings

No findings of significance were identified.

.2 (Closed) NRC Temporary Instruction (TI) 2515/161, Transport of Control Rod Drive (CRD) in Type A Packages

a. Inspection Scope

This TI was issued to address use of a Type A shipping container to ship control rod drives in a way that was inconsistent with its certificate of compliance. Inspectors reviewed shipping logs and questioned licensee personnel about the shipment of control rod drives and determined that none had been shipped since January 1, 2002. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

4OA6 Meetings, Including Exit

On January 5, 2006, the resident inspectors presented the inspection results to Mr. Bill Noll and other staff members. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

Attachment: Supplemental Information

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

C. Bach, Manager- Chemistry
C. Baucom, Licensing Manager
R. Baxley, Supervisor- Radiation Protection
M. Blew, ISI Coordinator
W. Brand, Supervisor- Radiation Protection
E. Caba, Engineering Superintendent
A. Cheatham, Radiation Protection Superintendent
C. Church, Engineering Manager
B. Clark, Nuclear Assurance Manager
D. Dyksterhouse, Engineering Programs Manager
W. Farmer, Engineering Superintendent
R. Hitch, Supervisor- Radiochemistry
J. Huegel, Maintenance Manager
R. Ivey , Operations Manager
E. Kapopoulos, Outage Management Manager
J. Lucas, Manager, Support Services - Nuclear
G. Ludlum, Training Manager
J. Moyer, Vice President, Robinson Nuclear Plant
W. Noll, Director of Site Operations
L. Smith, Supervisor- Radiation Control Training
D. Stoddard, Plant General Manager
S. Wheeler, Supervisor, Regulatory Support

NRC personnel

P. Fredrickson, Chief, Reactor Projects Branch 4
R. Bernhard, Senior Reactor Analyst

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

05000261/2515/161	TI	Transport of Control Rod Drive (CRD) in Type A Packages (Section 4OA5.2)

Opened/Closed

None

Discussed

None

Attachment

LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

Procedures
AP-008, Cold Weather Preparations, Rev. 13
EDP-009, Freeze Protection Panels, Rev. 28

Work Orders
658977-01, Freeze Protection - Plant Equipment
749336-01, Freeze Protection - Panel Check
711785-01, Freeze Protection - Panel Check
711791-01, Freeze Protection - Panel Check
711786-01, Freeze Protection - Panel Check
666189-01, Freeze Protection Circuits Related to Safety or Fire Protection
770324-01, Freeze Protection Circuits Related to Safety or Fire Protection
711603-01, Freeze Protection Circuits Related to Safety or Fire Protection
711605-01, Freeze Protection Circuits Related to Safety or Fire Protection

Section 1R04: Equipment Alignment

Partial System Walkdown

A emergency diesel generator system
Procedure OP-604, Diesel Generators A and B, Rev. 61
System Description, SD-005, Emergency Diesel Generators, Rev. 10
Design Basis Document, DBD/R87038/SD05, Emergency Diesel Generator System, Rev. 0
Work Order 767702-01, Replace Solenoid Coils B [Emergency Diesel Generator] Air Start
Clearance Order Checklist 101840, [Emergency Diesel Generator] B Air Start Solenoid Valve

Train A and B motor driven feedwater pump
Procedure OP-402, Auxiliary Feedwater System, Rev. 64
Drawing G-190197, Feedwater Condensate and Air Evacuation System Flow Diagram, Sheet 4 of 4, Rev. 55

B emergency diesel generator system
Procedure OP-604, Diesel Generators A and B, Rev. 61
Clearance Order Checklist 104252, A [Emergency Diesel Generator] Solenoid Coil Replacement
Clearance Order Checklist 104254, [Emergency Diesel Generator] Room A Supply Fan

Section 1R05: Fire Protection

UFSAR Sections
3.1.5.6, Fire Zone 20 - Emergency Switchgear Room and Electrical Equipment Area
3.1.3.1, Fire Zone 7 - Auxiliary Building Hallway (Ground Floor)
3.1.5.7, Fire Zone 22 - Control Room
3.1.1, Fire Zone 1 - Diesel Generator B Room
3.9.1, Fire Zone 29 - Service Water Pump Area

Procedures
Results from OST-611-11, Low Voltage Fire Detection and Actuation System Zones 19 & 20 (Semi-Annual), Rev. 4, 6/7/05
Results from OST-620, Carbon Dioxide Suppression System Weight Test (Semiannual), Rev 21, 10/1/05
Results from OST-624, Fire Damper Inspection (18-Month), Rev. 19, 9/5/04
Results from OST-628, Function Test of the Halon 1301 System (Annual), Rev. 20, 9/5/05
Results from OST-630, Halon 1301 Suppression System Weight Test (Semi-Annual), Rev. 26, 8/9/05
Results from, OST-611-6, Low Voltage Fire Detection and Actuation System Zones 11 & 13 (Semi-Annual), Rev. 3, 6/21/05
Results from OST-603, Motor Driven Fire Pump and Engine Driven Fire Water Pump Test (Weekly), Rev. 26, Rev. 26, 12/11/05

Other documents
Procedure Revision Request 111260, OST-624, Rev 19, Fire Damper Inspection (18-Month)
Procedure Revision Request 136360, OST-624, Rev 19, Fire Damper Inspection (18-Month)
Calculation RNP-M/BMRK-1008, Code Compliance Evaluation NFPA 12A - Halon Fire Extinguishing Agent Systems - Halon 1301, 8/23/05

Section 1R07: Heat Sink Performance

Procedure CM-201, Safety Related and Non-Safety Related Heat Exchanger Maintenance, Rev. 38
Procedure PLP-078, License Renewal Commitments and Credited Activities, Rev. 1
Self-Assessment Report 147354, Ultimate Heat Sink/Cooling Water Reliability
Work Order 649007-01, Clean and test B motor driven [auxiliary feedwater] pump oil cooler

Section 1R08: Inservice Inspection Activities

Procedures
NDEP-0201, Liquid Penetrant Examination Procedure for Robinson Nuclear Plant, Rev. 27
NDEP-0611, VT-1 Visual Examination of Nuclear Plant Components, Rev. 14
NDEP-0612, VT-2 Visual Examination of Nuclear Plant Components, Rev. 18
NDEP-0613, VT-3 Visual Examination of Nuclear Plant Components, Rev. 18
NDEP-0437, Ultrasonic Examination Procedure for Ferritic Piping Welds and Vessels $\leq$ 2 Inches Thickness for Robinson Nuclear Plant, Rev. 0, TR A

NDEP-0450, Ultrasonic Examination Procedure for Vessels (ASME Section XI), Rev. 0, TR A
EGR-NGGC-0207, Boric Acid Corrosion Control, Rev. 1

Action Requests
AR 169650, Boric Acid Leak at Valve RC-525
AR 170187, Boric acid leak at Valve SI-875H
AR 171786, Cracked Weld on Main Steam Support

Work Orders
Work Order 00664066, Replace Check Valve SI-873B
Work Order 00664068, Replace Check Valve SI-873A
Work Order 00633486, Correct Boric Acid Leak at CS Pump A
Work Order 00759301, Replace PCV - 455A
Work Order 00756647, Remove Boric Acid from RHR pump seal area

Section 1R12: Maintenance Effectiveness

Action Request 162642, [Dedicated shutdown diesel generator] output breaker failed to close
Procedure PM-435, Dedicated Shutdown Bus, 480 Volt Bus 4 and Exciter Field Breaker Inspection, Rev. 13

Maintenance Rule Documents
For system 5114 (Dedicated Shutdown System)
- Event List
- Monitoring Status
- Monitoring Trend
- Scoping and Performance Criteria

Section 1R15: Operability Evaluations

AR 170576, Problems with temporary jib crane
Calculation RNP-C/STRU-1243, Jib Crane Collision Loads
Calculation MS 1B,2B/1003, Pipe Stress Analysis Calculation

Section 1R16: Operator Work-Arounds

Work-Around 05-09, Place [loose parts monitoring system] in disable on the [reactor turbine gage board] prior to moving control rods
Work-Around 05-11, South service water strainer blows down continuously when left in the intermittent position
Work-Around 05-12, Pressure control valve (PCV-1380) is not operating properly therefore valve MS-61 is throttled
Work Order 775808, [Loose parts monitoring system] trouble when moving control rods in manual
System Description, SD-052, Loose Parts Monitoring System, Rev. 4
System Description, SD-007, Rod Control System, Rev. 4
Operating Procedure, OP-007, Loose Parts Monitoring System, Rev. 17

Section 1R19: Post Maintenance Testing

Procedures
OST-918, Dedicated Shutdown Equipment and Instrumentation Check (Monthly), Rev. 13
OST-930, Control System Component Test for PCV-455C and PCV-456, Rev. 13
OST-409-1, [Emergency Diesel Generator] A Fast Speed Start, Rev. 24
OST-207, Comprehensive Flow Test for the Motor Driven Auxiliary Feedwater Pumps, Rev. 42
OST-303-2, Service Water Booster Pump B Test, Rev. 2

Engineering Changes
Engineering Change 58305, [Flow Instrument] FI-660 Replacement
Engineering Change 58657, Appendix R Pressurizer [Power Operated Relief Valve] and Charging Pump Make-up Modification

Work Orders
Work Order 684283-93, Operations [post maintenance test], perform switch isolation for PCV-456 Per EC 58657
Work Order 684283-94, Operations [post maintenance test], perform switch isolation for PCV-455C per EC 58657
Work Order 566670, Change out [emergency diesel generator] governor with one from stock every 10 years
Work Order 770000, TCV-1660 failed to close and standby coolant pump failed to start
Work Order 557206, Valve hard to manually cycle - declutch lever faulty
Work Order 621871, Replace grease in AFW-V2-20B-MO during [refueling outage] 23
Work Order 791943, Replace rotating assembly on [service water booster pump] B
Inservice Testing Performance Evaluation Number 05-40, Service Water Booster Pump B

Section 1R20: Refueling and Outage Activities

Procedures
FMP-017, Core Mapping Following Fuel Loading, Rev.8
OMM-033, Implementation of CV Closure , Rev. 15
PLP-006, Containment Vessel Inspection/Closeout, Rev. 64
EST-139, [Emergency Core Cooling System] Containment Sump Inspection, Rev. 7
GP-002, Cold Shutdown to Hot Subcritical at No Load [Temperature Average], Rev. 94

Other
System Description, SD-10, Nuclear Instrumentation System, Rev. 7
Contingency Plan - OST-154, Safety Injection System High Head Check Valve Test
Engineering Change 58475, [Robinson Unit 2 Cycle 24] Reload Core Design and Safety Analysis

Section 1R22: Surveillance Testing

Procedures
MST-025, Emergency Bus E-2 Undervoltage and Load Shed Test (Refueling Shutdown), Rev. 12
EST-137, Local Leak Rate Test of Mechanical Penetration Sleeves, Radiation Monitoring Valves, Station Air Valves, Purge Exhaust Valves, Pressure Relief and Post-accident Venting Valves (Refueling Shutdown or Other Convenient Interval Not to Exceed 2 Years), Rev. 12
EST-023, Control Room Emergency Ventilation System (Once Per 18 Months, 720 Hours of Operation, & Filter Change), Rev. 20
OST-253, Comprehensive Flow Test for the [Residual Heat Removal] Pumps, Rev. 38
EST-050, Refueling Start-Up Procedure, Rev. 42
OST-051, Reactor Coolant System Leakage Evaluation, Rev. 34

Other
System Description, SD-036, [Heating Ventilation and Air Conditioning], Rev. 9
Drawing 5379-685, Chemical and Volume Control System Purification and Make-Up Flow Diagram, Sheet 2 of 3, Rev. 57

Section 1R23: Temporary Plant Modifications

Engineering Change 62809, Repair Steam Leak on C [Main Steam Isolation Valve]
Work Order 78319-04, Perform temporary repair to leaking cover
Procedure CM-314, Schuttle and Koerting Check Valve Inspection, Rev. 8

Section 1EP6: Drill Evaluation

Procedures
Procedure EPPR0-04, [Emergency Procedure] Performance Indicators, Rev. 7
Procedure EPPR0-05, Scenario Development and Drill Control Guidelines, Rev. 6

Action Requests
AR 175529, Emergency notification form errors during [Emergency Procedure Drill]
AR 178839, [Nuclear assessment section] of [emergency response organization] accountability practices
AR 179355, [Emergency procedure] drill November 8, 2005 - [emergency response organization] logs and paperwork
AR 179375, [Emergency procedure] drill November 8, 2005 - personnel did not check into [operations support center]
AR 179375, [Emergency procedure] drill November 8, 2005 - eating after “No Eating ...” implemented

Other
NEI 99-02, Regulator Assessment Performance Indicator Guideline, November 2001, Rev. 2
Emergency Response Organization Drill [Scenario], November 2005
Emergency Response Organization Drill Results, 11/8/05

Section 2OS1: Access Control To Radiologically Significant Areas

Procedures, Manuals, and Guides
DOS-NGGC-0007, Internal Dose Calculations, Rev. 9
HPP-001, Radiologically Controlled Area Surveillance Program, Rev. 85
HPP-003, Control of Hot Particles, Rev. 10
HPP-004, Radiological Control of Tools and Equipment, Rev. 47
HPP-006, Radiation Work Permits, Rev. 70
HPP-007, Handling and Storage of Contaminated and Radioactive Materials, Rev. 25
HPP-012, Monitoring and Changing of Plant Process Filters, Rev. 12
HPP-105, Airborne Radioactivity Surveillance, Rev. 29
HPS-NGGC-0014, Radiation Work Permits, Rev. 3
HPS-NGGC-0013, Personnel Contamination Monitoring, Decontamination, and Reporting, Rev. 3
HPS-NGGC-0003, Radiological Posting, Labeling and Surveys, Rev. 8
HPP-314, Removal of TRI-NUC Filters/trash from the Spent Fuel Pool, Rev.10
HPP-500-3, Radiation Control Work Planning Process, Rev. 10
HPP-500-4, Health Physics - Conduct of Pre-job Briefings, Rev. 8
HPP-500-5, Radiation Control - Conduct of Radiological Job Coverage, Rev. 2
NGGM-PM-0002, Radiation Control and Protection Manual, Rev. 34

Action Requests
AR 160634, Employees locked inside room during LHRA barrier preventative maintenance
AR 124906, Radworker reused faceshield in contaminated area
AR 125120, LHRA key taken home
AR 135988, Radiological postings were moved
AR 152685, Technicians performed activities not allowed by RWP
AR 164237, Contaminated area inserts missing from radiological postings
AR 156259, Radiological sign found out of position at SFP
AR 163873, Inconsistent posting around RHR pump room handrail

Section 2OS2: ALARA Planning and Controls

Procedures
ADM-NGGC-0105, ALARA Planning, Rev. 7
EGR-NGGC-0201, Incorporation of ALARA for Design and Engineering Work, Rev. 2
ERC-004, Setup and Use of Temporary ALARA Equipment, Rev. 9
HPP-500-3, Radiation Control Work Planning Process, Rev. 10
PLP-016, Radiation Work Permit Program, Rev. 27
PLP-017, ALARA Program and Alara Committee Activities/ Responsibilities, Rev. 21

Records and Data
H.B. Robinson Nuclear Plant Refueling Outage #22 ALARA Report,10/11/04
H.B. Robinson Nuclear Plant- RNP Dose Reduction Plan, 8/16/05
Robinson Nuclear Plant, Alara Continuous Improvement Strategy-fuel Cycle 23, 8/16/05
Radiation Control Monthly Report-December 2004
Radiation Control Monthly Report-July 2005
ALARA Committee Meeting Power Point Presentation-7/21/05

Spreadsheet: 2005 Dose Budgets, 8/16/05
ALARA Work Plan 05-101, Dry Fuel Storage Project, Rev.0
ALARA Work Plan 05-101, Dry Fuel Storage Project, Rev.2
ALARA Work Plan 23-005, RO-23 Radiation Control Activities, Rev.0
ALARA Work Plan 23-006, RO-23 Decontamination Activities, Rev.0
ALARA Work Plan 23-014, RO-23 ISI Work Plan, Rev. 0
ALARA Work Plan 23-020, RO-23 Scaffolding, Rev. 0
ALARA Work Plan 23-043, RX Head Replacement, Rev.0

Action Requests
AR 145989, The ALARA committee did not meet in third quarter of 2004
AR 147917, During the ALARA committee meeting on 1/12/05, it was reported that 35 on-line containment entries were made, resulting in an accumulated dose of 2011 mrem.
AR 151022, ALARA cameras have been installed per ERC-004 since 1996.
AR 153334, Develop method to ensure that dose saving initiatives in ALARA plans are clearly defined as opposed to the use of vague general statements.
AR 163014, Evaluate the procurement of a marque with electronic dosimeter interface to display the general area dose rates. This would be a great ALARA tool. They are needed in high traffic areas and high dose rate areas to communicate to the worker.

Section 4OA1: Performance Indicator Verification

Procedures
REG-NGGC-0009, NRC Performance Indicators And Monthly Operating Report Data, Rev. 4
CAP-NGGC-0200, Corrective Action Program, Rev. 16
CAP-NGGC-0205, Significant Adverse Condition Investigations, Rev. 4
CAP-NGGC-0206, Corrective Action Program Trending and Analysis, Rev. 1

Records
AR 00169709, Two personnel installing shielding in “B” pump bay received dose alarms on their ED’s. Both notified RC and exited the RCA upon recognition of the alarm and no administrative limits were received.
AR 00131924, Dose projection for filter HIC shipment exceeded.
AR 00135383, Dose projected for week ending 8/20/04 was exceeded.
AR 00140876, Dose projection for week ending 10/5/04 was exceeded.
AR 00143479, Radiation control group exceeded annual dose budget.
AR 00144338, Weekly dose goal exceeded for week of 11/13-19/04.
AR 00148088, The 2004 chemistry dose goal was exceeded by ~162 mrem.

Section 4OA2: Identification and Resolution of Problems

AR 140413, [Nuclear assessment section] issue R-TQ-04-01-I1 [nuclear condition report] investigations
Procedure TAP-001, Training Conduct and Expectations, Rev. 1
Procedure CAP-NGGC-0200, Corrective Action Program, Rev. 16
Procedure CAP-NGGC-0206, Corrective Action Program Trending and Analysis, Rev. 1
Site-Wide Analysis of Condition Reports for Performance Trends, April 1- June 3, 2005
Maintenance CAP Rollup & Trend Analysis, August, 2005

Operations CAP Rollup & Trend Analysis, August, 2005
Outage & Scheduling CAP Rollup & Trend Analysis, June, 2005
Plant Support Group CAP Rollup & Trend Analysis, March, April, May, and June, 2005

Section 4OA5: Other

Reactor Head Replacement
ALARA Work Plan 23-019, RO-23 Reactor Head Work and Refueling Activities, Rev. 0
ALARA Work Plan 23-043, Reactor Head Replacement Project, Rev. 0

TI 2515/161 CRD shipped in Type A container
Radioactive Material Shipping Log - January, 2002 to October 2005