



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

November 19, 2004

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

**SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2 - NRC PROBLEM  
IDENTIFICATION AND RESOLUTION INSPECTION REPORT  
NO. 05000261/2004007**

Dear Mr. Moyer:

On October 22, 2004, the U. S. Nuclear Regulatory Commission (NRC) completed an inspection at the H. B. Robinson Steam Electric Plant Unit 2. The enclosed report documents the inspection findings, which were discussed on October 22, 2004, with you and other members of your staff during an exit meeting.

This inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of activities, and interviews with personnel.

On the basis of the sample selected for review, there were no findings of significance identified during this inspection. The inspectors concluded that problems were properly identified, evaluated, and resolved within the corrective action program. However, during the inspection, several examples of minor problems were identified, including conditions adverse to quality that were not identified for entry into the corrective action program, errors in performing cause evaluations, and corrective actions that were ineffectively tracked or had not occurred.

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Sincerely,

*/RA/*

Paul Fredrickson  
Reactor Projects Branch 4  
Division of Reactor Projects

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

cc w/encl: (See page 3)

cc w/encl:

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

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

Report No: 05000261/2004007

Licensee: Carolina Power & Light (CP&L)

Facility: H. B. Robinson Steam Electric Plant, Unit 2

Location: 3581 West Entrance Road  
Hartsville, SC 29550

Dates: October 4 - 8, 2004 (Week 1)  
October 18 - 22, 2004 (Week 2)

Inspectors: E. DiPaolo, Senior Resident Inspector, Brunswick (Lead Inspector)  
G. MacDonald, Senior Project Engineer  
D. Jones, Resident Inspector

Approved by: Paul Fredrickson, Chief  
Reactor Projects Branch 4  
Division of Reactor Projects

Enclosure

## SUMMARY OF ISSUES

IR 05000261/2004007; Carolina Power & Light Company; on 10/4/2004 - 10/22/2004; H. B. Robinson Steam Electric Plant Unit 2; Biennial baseline inspection of the identification and resolution of problems.

The inspection was conducted by a senior resident inspector, a resident inspector, and a senior project engineer. No findings of significance were identified. 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.

### Identification and Resolution of Problems

The licensee was effective at identifying problems at a low threshold and entering them into the Corrective Action Program (CAP). Management's involvement in the review of issues documented in the program was timely and appropriate. Self-assessments and audits of the CAP, and trend reviews were critical, thorough, and effective in identifying program deficiencies. Although not reflective of the general assessment into licensee problem identification, the inspectors identified a case where equipment deficiencies in a plant area were not being appropriately identified.

Prioritization and evaluation of problems in the CAP were effective. The technical adequacy and depth of evaluations, proposed corrective actions and timeliness were in a manner commensurate with the safety significance of the issue. The inspectors identified noteworthy deficiencies associated with five cause determinations. Although the inspector-identified discrepancies indicated some problems in the evaluation of issues, overall, this area of the program was considered effective. The licensee had identified the site's evaluation of issues as an area of program focus.

The CAP was effective in correcting problems consistent with the importance to safety of the issues. Effective management involvement in the process was evident. Outstanding corrective actions were tracked and delays in the implementation of corrective actions received the appropriate level of management attention. During the course of the inspection, the inspectors identified isolated problems with the implementation of corrective actions. However, these issues did not affect the overall assessment of corrective action implementation.

Individuals actively utilized the CAP and employee concerns program (ECP). Issues entered into the ECP received the appropriate level of management involvement. Management demonstrated sensitivity to organizational attitude toward the CAP and a safety conscious work environment. Based on discussions conducted with licensee employees and a review of station activities, site personnel felt free to report safety concerns.

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## REPORT DETAILS

### 4. OTHER ACTIVITIES (OA)

#### 4OA2 Problem Identification and Resolution

##### a. Effectiveness of Problem Identification

##### (1) Inspection Scope

The inspectors reviewed action requests (ARs) selected across the seven cornerstones of safety listed in the Attachment to verify that problems being properly identified, appropriately characterized, and entered into the Corrective Action Program (CAP). The inspectors reviewed program documents which described the administrative process for documenting and resolving issues. For the assessment of the CAP, the inspectors focused on several risk significant systems which included the emergency diesel generators, component cooling water system, safety injection system, residual heat removal system, and nuclear service water system. The inspectors reviewed a sampling of ARs that had been generated since the last problem identification and resolution inspection (August 2002).

The inspectors reviewed plant equipment issues associated with Maintenance Rule (a)(1) items, functional failures, maintenance preventable functional failures (MPFF), repetitive MPFFs, and system health reports associated with the focus systems to verify that problems were being identified. Plant walkdowns of the focus systems were performed to verify that no evident material condition problems existed that were not already identified.

During the inspection, the inspectors reviewed operator logs, operator turnover sheets, control room deficiency lists, temporary modification lists, and performed control room walkdowns to verify that equipment issues were entered into the CAP at an appropriate level. Issues identified in lower tier corrective action programs (e.g., plant observation program) were reviewed to verify that they were appropriately addressed. Industry operating experience (10CFR21 notices and NRC information notices) items were reviewed to verify that applicable issues were appropriately evaluated and addressed.

The inspectors audited several of the licensee's Management Review Team Meetings, CAP Unit Evaluator Meetings, Plan-of-the-Day Meetings, and an Engineering CAP Rollup Meeting to determine the level of management involvement into issues and problems. This was also performed to gauge the effectiveness of the screening process in ensuring that problems were properly entered into the CAP.

The inspectors reviewed several self-assessments and audits of the CAP to verify that findings were being entered into the CAP and that appropriate corrective action was taken to resolve program deficiencies. Program trend reports and statistics were reviewed to verify that indicated trends were entered into the CAP at the appropriate level.

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(2) Assessment

No findings of significance were identified. Based on the sample selected, the inspectors determined that the licensee was identifying problems and entering them into the CAP at a very low threshold. Problems identified through industry experiences were properly addressed. The inspectors observed appropriate and timely management involvement in the review of the issues documented in the program.

Self-assessments, audits of the CAP, and trend reviews were critical, thorough, and effective in identifying deficiencies in the CAP. These deficiencies were routinely entered into the CAP and corrective actions were implemented.

Although not reflective of the general assessment of licensee problem identification, the inspectors identified a case where equipment deficiencies were not being appropriately identified. During walkdowns of nuclear service water structure underground power cable manholes, the inspectors identified conditions (e.g., accumulation of silt that clogged a drainage pipe, sump pump deficiencies, etc.) that affected proper drainage of water from the manholes. These conditions indicated improper preventive maintenance activities of these areas. Additionally, the condition of silt that resulted in a clogged drainage pipe had been previously identified during an NRC inspection for license renewal in May 2003. AR 94315 was generated at that time as a result of the observation. However, actions identified by the AR did not correct the condition. The licensee determined that inspection of nuclear service water structure power cable manholes were not contained in the preventive maintenance program and entered this issue into the CAP (AR 140998). Additionally, the licensee generated AR 141982 to address the lack of organizational ownership of the area or a program to inspect and maintain the manholes.

b. Prioritization and Evaluation of Issues

(1) Inspection Scope

The inspectors reviewed ARs listed in the Attachment to verify that the issues were properly prioritized and the cause evaluated in accordance with the procedural requirements of the CAP. The review included issues associated with previously identified violations of NRC requirements. The inspectors reviewed cause evaluations to verify that the evaluation was commensurate with the safety significance of the issue, and that the evaluation addressed operability, reportability, common cause, generic concerns, and extent of condition, where appropriate. For significant conditions adverse to quality, the inspectors checked that the licensee adequately identified the causes and corrective actions to prevent recurrence. Documents reviewed are listed in the Attachment.



(2) Assessment

No findings of significance were identified. In general, the licensee's prioritization and evaluation of problems in the CAP were considered effective. The technical adequacy and depth of evaluations, as documented in individual ARs, were acceptable. The inspectors found that the licensee properly prioritized proposed corrective actions in a manner commensurate with the safety significance of the issue. Based on the total number of ARs reviewed during the inspection, the inspectors concluded that the licensee's CAP was generally being effectively implemented with respect to evaluation of problems. However, the inspectors identified several deficiencies associated with individual cause determinations as shown below:

- Priority 2 ARs 75691 and 75489 were written for a test failure of safety injection (SI) system relief valve SI-871. The valve lifted with pressure marginally higher than allowable but had a significantly lower reseal pressure than design. The evaluation of the affect on system operability of the valve's test failure did not address the affect of the low reseal pressure on past operability of the SI system. The relief valve protects the common SI and containment spray (CS) suction piping from overpressure. Highest system pressure would most likely occur during piggyback operation when the residual heat removal (RHR) pump provides flow to the CS/SI suction header. The valve relieves to the CS discharge header. The inspectors concluded that the affect on the SI system would be a potential loss of SI suction inventory to containment which would not be significant in piggyback mode when the sump was the suction supply.
- The licensee identified an increase in relief valve test failures before and during refueling outage (RO) 21. ARs were written to evaluate and fix the valve test failures. AR 74421 was written to investigate the trend of relief valve test failures, but this AR did not identify any corrective action other than to repair and retest the individual valves and expand the test scope as necessary. There were additional activities identified which could impact relief valve performance, however they were all identified as enhancements not as corrective actions.
- A root cause evaluation associated with an inattentive employee documented in AR 61013 was not of sufficient depth to determine the actual root cause. However, effective corrective actions were implemented to address the actual cause. The licensee indicated that root cause evaluations performed by the site organization which performed the evaluation had previously been identified as an area of weakness. The licensee had focused on improvements in the quality of root cause evaluation by the organization.
- A self-assessment of the motor monitoring program in 2000 identified a weakness that a minimum acceptance criterion for degraded direct-burial cables was not well established. This weakness in the program required motor cable determination to discern if the motor or the cable was degraded. The

corrective actions of AR 26298, written as a result of the self-assessment, only addressed improvements in the motor monitoring program. No corrective actions were established to address the weakness of the degraded condition of the site direct-burial power cables or power cable acceptance criteria not being well established. The licensee determined that the corrective actions of AR 26298 were insufficient and generated AR 141988 to evaluate the condition of the cables for acceptability.

- The root cause evaluation, as documented in AR 133713, associated with a failure of a Westinghouse Type BF66 Relay identified a manufacturing defect as the cause. This type relay is used throughout the reactor protection system. The corrective action to prevent recurrence was limited to the replacement of 10 relays obtained within the same purchase order. The evaluation did not address approximately 300 installed relays which were constructed utilizing the same manufacturing techniques as the failed relay and, therefore, subject to the same type of manufacturing defect. Subsequently, information was provided by Westinghouse indicating that the relay failure may be isolated and not caused by a manufacturing defect. At the end of the inspection, the licensee was continuing to evaluate this issue.

Although the inspector-identified discrepancies indicated some problems in the evaluation of issues, overall, this area of the program was considered effective based on the number of ARs reviewed. The inspectors noted that the licensee had identified the site's evaluation of issues as an area of program focus.

c. Effectiveness of Corrective Actions

(1) Inspection Scope

The inspectors reviewed corrective actions to verify that the licensee had identified and implemented corrective actions associated with identified causes for the ARs listed in the Attachment. The timeliness of the corrective actions were reviewed to assess whether they were implemented or planned consistent with the importance to safety of the issues. The inspectors reviewed maintenance rework items, Maintenance Rule functional failures for focus systems, select canceled modifications, and select items from the operator workarounds list to verify that no inconsistencies existed with prior established corrective actions for issues. The inspectors verified that common causes and generic concerns were addressed where appropriate. The review included a sample of the oldest open ARs in the licensee's database to verify that the planned dates for implementing corrective actions were justified and reasonable. Licensee followup of corrective action effectiveness associated with Priority 1 (significant condition adverse to quality) ARs was reviewed to verify appropriateness of the reviews. The inspectors also reviewed and assessed the adequacy of corrective actions associated with non-cited violations (NCVs) of regulatory requirements identified since the last problem identification and resolution inspection (August 2002).

(2) Assessment

No findings of significance were identified. The inspectors determined that the licensee's CAP was effective in correcting problems. Management involvement in the process was effective. The inspectors found that the age of outstanding corrective actions were tracked, the bases for delays in the implementation of corrective actions received the appropriate level of management attention, and that the delays were reasonable. Corrective actions for NCVs were determined to be adequate. During the course of the inspection, the inspectors identified some problems with the implementation of corrective actions as discussed below:

- AR 127517 documented that a manufacturer-installed cylinder plug, which is a component of the indicator valve adapter, was left loose when installed on the B EDG. During the performance of a surveillance test, the plug was discharged while the engine was running. The inspectors identified that corrective actions to verify tightness of the manufacturer installed plugs following indicator valve adapter replacements were not implemented. AR 139413 was written to revise the preventive maintenance procedure.
- AR 92949 evaluated two cases where relief valves lifted and failed to reseat as designed. One corrective action item was to revise relief valve nozzle and guide ring setting procedures to incorporate independent verification into the relief valve settings. Procedure CM-102 was revised to incorporate independent verification of the correct direction of rotation while setting the relief valve, but the revision did not incorporate independent verification of the final notch settings.
- AR 30516 was written to address conduit damage caused by gaps in pressurizer insulation. The effectiveness review of corrective actions associated with this AR was completed without corrective action to prevent recurrence being complete. The temporary insulation was still in place on the pressurizer, the mirror insulation had not yet been replaced with the Nukon blanket insulation. AR 140654 was generated for resolution.
- AR 124697 was written for incorrect piping utilized when implementing the CS/SI full flow test line modification. The incorrect pipe was replaced with the correct material. The AR identified two inappropriate acts which led to the use of the incorrect material. These were incorrect material reserved by the planner and failure by the craft to verify the material against the work package prior to installation. Corrective action only addressed the craft aspect through counseling and a stand-down to reestablish material verification standards. No corrective action was included to address the planning aspect of the failure.
- During maintenance of a nuclear service water valve motor-operator in 2002, megger readings as measured from the breaker, were less than established acceptance criteria. Subsequently, acceptable motor resistance readings were taken locally with the power cables determined with satisfactory results. The

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investigation determined that the cause of the failure was due to buried cable moisture intrusion due to cable aging. Established criteria specified that the cables should have been replaced. However, the inspectors identified that no corrective action was pursued to correct or evaluate the degradation of the cable. Although direct buried cable insulation degradation is a known site problem, the issue has not been entered into the CAP. The site recognized that replacement of the cables will be a necessity to the long term continued operation of the plant. At the completion of the inspection, the site budget plan included replacement of the cables which was planned to commence in 2006. Based on the plan to replace the cables, no violation of regulatory requirements was identified. AR 140969 was initiated to develop a preventative maintenance process to ensure that cables are properly evaluated when disconnected from motors. The licensee also initiated AR 141988 due to the failure of a previous evaluation (AR 26298) to establish acceptance criteria for cables when megger readings are less than the established acceptance criteria.

Although there were problems in implementing corrective actions as noted above, the inspectors determined that, overall, corrective actions were timely and effective consistent with the importance to safety of the issues based on the sample reviewed.

d. Assessment of Safety-Conscious Work Environment

(1) Inspection Scope

The inspectors questioned licensee personnel during interviews concerning their experience with the CAP to assess whether there were impediments to the establishment of a safety conscious work environment. Specifically, personnel were asked questions regarding any reluctance to initiate ARs and the adequacy of corrective action for identified issues. The inspectors interviewed the licensee's Employee Concerns Program (ECP) representative to assess the adequacy of procedural control, tracking of concerns, and trending of issues. Several ECP issues and evaluations were reviewed with respect to maintaining and promoting a safety conscious work environment and to verify that issues affecting nuclear safety were being appropriately addressed. The inspectors assessed licensee management sensitivity to a safety-conscious work environment through inspection activities, discussions with management and licensee personnel, and attendance at various meetings. The inspectors interviewed several managers, attended several meetings, and reviewed several applicable corrective action documents to assess licensee management sensitivity to a safety conscious work environment. Documents reviewed are listed in the Attachment.

(2) Assessment

No findings of significance were identified. Individuals actively utilized the CAP and ECP as evidenced by the low threshold of issues entered into the programs. Issues entered into the ECP received the appropriate level of management involvement. When issues became evident through either the ECP or CAP assessments, site management demonstrated sensitivity to organizational attitudes toward the CAP and a safety conscious work environment. In particular, CAP Assessment 76934 identified an assessment weakness that workers' attitude toward the CAP had declined. The associated investigation, documented in AR 90592, was thorough and identified corrective actions to raise site personnel sensitivity in this area. Additionally, an employee concern related to group dynamics and site culture was appropriately raised to senior management and properly investigated. The inspectors determined that a safety conscious work environment was evident at the site.

40A6 Meetings, Including Exit

On October 22, 2004, the inspectors presented the inspection results to Mr. John Moyer and other members of his staff. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

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## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee personnel

**C. Baucom, Supervisor Licensing/Regulatory Programs**

A. Cheatham, Radiation Protection Superintendent

C. Church, Engineering Manager

B. Clark, Manager - Nuclear Assessment Section

J. Huegel, Maintenance Manager

**R. Ivey, Operations Manager**

**J. Lucas, Manager, Nuclear Site Support**

G Ludlam, Training Manager

D. Martrano, Performance Evaluation Section

**J. Moyer, Vice President Robinson Nuclear Plant**

W. Noll, Director of Site Operations

D. Stoddard, Plant General Manager

S. Wheeler, Lead Self Evaluation Specialist

D. Winters, Supervisor Plant Support Group

T. Lee, Employee Concerns

#### NRC personnel

P. Fredrickson, Chief, Reactor Projects Branch 4

L. Wert, Deputy Director, Division of Reactor Projects

### LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None.

## LIST OF DOCUMENTS REVIEWED

### Significant Action Requests (AR), Priority 1

133713 MR Performance Criteria Exceeded for System 1080 Protection Relays  
 132944 Inattentive Employee  
 123399 Trend in Employee Inattentiveness  
 61013 Inattentive Employee  
 76766 Seal Leak from RHR Pump "A"; Unplanned  
 108878 Simultaneous Failure of RHR Pump Rooms Sump Level Indicators  
 82945 TS allowable surveillance interval exceeded for A EDG  
 79818 Potential station blackout EDG common cause failures  
 30920 Fault pressure relay failure for C phase main transformer  
 77439 Unexpected power increase while flushing the cation bed - adverse trend  
           per RES cap roll-up  
 21953 SSFI concern with plant calculations  
 22494 Replacement of the B EDG fuel oil transfer pump and motor  
 122720 NAS Assessment R-EP-04-01, Issue 1 on 10 CFR 50.54Q  
 112813 Proposed NCV Pursuant to 50.47(B)2  
 100571 Acceptance Criteria Exceeded on a RAM Package  
 104566        N42 Upper Detector Spiking Down  
 124140 Feedwater Transient  
 115704 Potential Primary to Secondary Leakage Based on R-24B  
 76524 EDG B Failed Fast Start During OST-163  
 103661 A EDG Lube Tubing Not Connected After Maintenance  
 82945 TS Allowable Surveillance Interval Exceeded for A EDG  
 24488 Unavailability Hours Exceeded for Deepwell Pump B  
 126009 Plastic Piece Found Downstream of SI-Pmp-B Discharge Check Valve  
 77042 EST-083 Was Listed As Closed But Was Not Fully Completed  
 030516 Damaged Conduit For PCV-456 Solenoid and Limit Switches

### Adverse Action Requests (AR), Priority 2

121511 ECCS Sump Monitoring  
 126196 Possible Corrosion on "B" RHR Pump Stuffing Box Extension  
 73692 "A" RHR Pump Motor Oil Level Too High  
 82889 UFSAR Design Flow Rate for RHR Heat Exchanger Shell Side Flow Incorrect  
 98476 PMTR for Alternate Power Breakers for MCC-5 and RHR pump A Not Identified  
 67826 Inattentive Employee  
 105553 Inattentive Employee  
 117418 Inattentive Employee  
 112008 Inattentive Employee  
 125357 Site gate issue  
 131205 LC-475B1-X(B) Failed to Deenergize during MSF-021  
 83209 10 CFR 21 Notification on Whiting Crane #25 Gearcases  
 130440 Whiting Crane Part 21 Notice 2004-015-00, Overstress of Welds on Slack Link Load  
           Sensing Structural Frames of Cranes  
 73823 AFW-39 Left Tagged  
 74341 Boundary Value Leak-by Leads to AOP-14 Entry  
 84308 CC-702 Hinge Bracket Fasteners  
 94309 Revise Inspection Due Date for CC-738  
 94318 Revise Due Date for Check Value Inspection of CC-931  
 97157 CCW Tritium Analysis Concern  
 98216 Failure of CCW Pump to Start

111506 Closed System Inside Containment  
 125379 Relief Valve CC-729 Nozzle Ring Set Incorrectly  
 74421 Relief Valve Failures  
 76171 Diesel Fuel Oil Transfer Pump Motor Fault  
 90592 CAP Assessment Weakness #2 - Workers' Attitude Toward CAP  
 114067 Boric Acid on Containment Floor  
 11379 Clearance on C Service Water Pump Motor Heater  
 20521 Intermediate Range Allowed values non-conservative  
 24407 EDG fuel oil day tank minimum level  
 82549 Maintenance Rule functional failure 52/36B  
 82800 Elevated CCW Temperatures Greater Than 105 Degrees  
 106891 B [Emergency Diesel Generator] Standby Circulating Pump Rework on [Work Request Number] 469914-01  
 126604 Unanticipated Service Water Auto Isolation to Turbine Building When Restoring Service Water  
 125683 B EDG Governor Operating Improperly  
 127517 EDG B Cylinder Test Valve Plugs  
 133839 A EDG Signs of High Temperature on the Generator Output Bus Bar  
 89466 B EDG Shutdown OST-401-2 Due to Oil Leak  
 81574 10CFR21 Report for a Defective Fuel Injector Pump  
 103726 EDG A Generator Outboard Bearing Debris in Oil  
 89819 Concrete Chips Found in the B CCW Heat Exchanger  
 126003 AOP-022 Entered for Service Water Leak  
 90195 SI Valve SI-924 Found Out of Position  
 89711 20 MW Load Reduction Due To Spurious Turbine Runback  
 84732 Unanticipated LCO Entry (EDG B Out of Service)  
 133879 Check Valve DA-20A Lower Guide was Detached from Disc  
 88722 SW-338 Found Out of Position  
 94315 Poor Material Condition of Cables in Electrical Manholes  
 11379 Clearance 9801136  
 70285 V6-12D-MO Failed PM-409 Required Causing Extended LCO Time  
 95322 SW Pump D Maintenance/LCO Significantly Extended  
 24363 Functional Failure of Deepwell Pump B  
 137710 B Deepwell Pump Tripped - Maintenance Rule High Safety Significance  
 26298 Motor Program Self-Assessment  
 136050 SI-879A Check Valve Bonnet Gasket Not Installed  
 128816 SI-879A Has Active Leakage  
 125435 Insufficient Insulation Removal for ISI Caused Rework  
 123963 Fabrication Error Identified on Struts  
 83214 Part 21 Rockbestos Firewall III Cable KXL Insulation  
 89053 Rockbestos-Suprenant Firewall III Cable 10CFR21 Notification  
 126178 IN 04-009 Corrosion of Steel Containment and Liners  
 127512 CCW Pmp C Indication Dual When Attempted to Start  
 129531 SI-Pmp-C PMT Failed Due To Flow and Pressure Above Curve  
 118549 B SI Pump Motor Bearing Degradation  
 124697 CS/SI Full Flow Test Piping Installation Errors  
 124548 Incorrect Schedule Pipe Issued  
 129650 Venting the BIT Header  
 121862 SI-Pmp-A Has A Possible Through Casing Leak



74796 SI Pmp C Casing Torqued To Incorrect Value For 1<sup>st</sup> Pass  
 117303 High Trace Metals in Oil Sample  
 74421 Evaluate Recent Trend In Relief Valve Test Failures  
 92949 Review NCR 31337 Loss Of CCW Durig OST-946 on 5/4/01  
 75489 SI-871 Lifted Above The Allowable Band When Tested IAW EST-112  
 75691 Re-Seat Pressure For SI-871 Is 50 PSI Valve to Be Retested

#### Improvement Action Requests (AR), Priority 5

100868 Informal Self-Assessment - Post Maintenance Testing Process Review  
 116765 NRC Information Notice 04-01, Auxiliary Feedwater Pump Recirculation Line  
 Orifice Fouling  
 97608 Improvement Item-RHR Pump Venting Sequence  
 77575 [Local Clearance and Test Request Request] Number 40761 in Place Greater  
 Than 90 Days  
 76279 Track Resolution of CSI-PMP-C Discolored Oil

#### Procedure Modification Requests (PMR)

87177 EDG B Governor Friction Clutch Torque Check  
 78956 Add PM for Main Bearing Oil Booster  
 96255 Change Frequency of PS-4500A Calibration to line Up with EDG  
 Maintenance Outage  
 72570 Service Water Header Strainer PM  
 86665 Establish PM with Two Models: Install/Remove Temporary Cooling  
 at HVH-1, 2 ,3, and 4

#### Canceled Action Requests (AR)

69943 Resource challenges for total exposure  
 70416 Repeat failures of PI-1619A  
 65357 PI-1619A is breaking approximately every two months  
 70666 SPDS communication was called in and should not have been  
 73926 Weakness from EP Drill on 9/3/02  
 74444 DS bus feeder breaker 52/32A failed to reclose  
 74795 Rework on HDV-224B  
 31924 Potential adverse trend in rework

#### Operating Experience Items

Part 21 Notice 2004-015-00, Overstress of Welds on Slack Link Load Sensing Structural Frame  
 of Cranes  
 Part 21 Notice 2004-007-00/01/02, Potential Safety Hazard with Woodward Digital  
 Reference Unit  
 Part 21 Notice 2004-005-00, Potential Slippage of Aluminum Roots Blowers on Opposed  
 Piston EDGs  
 Part 21 Notice Event #39512, Firewall III Cables May Include an Alternate Resin  
 Information Notice 2002-12, Submerged Safety-Related Electrical Cables  
 Information Notice 2003-20, Derating of Whiting Cranes

Information Notice 2004-01, Auxiliary Feedwater Pump Recirculation Line Orifice Fouling  
 Information Notice 2004-08, RCS Pressure Boundary Leakage  
 Information Notice 2004-09, Corrosion of Steel Containment and Liners (Evaluated)  
 Information Notice 2004-10, Loose Parts in Steam Generators  
 Information Notice 2004-12, Submerged Safety-Related Electrical Cables  
 Actions taken for relief valves in response to NRC IR 05000400/2003008  
 Letter from Engine Systems, Inc., INPO OE Item 11848 for Woodward Governor, Dated 6/5/01  
 Part 21 Notice 2002-25-1, Fuel Injector Pump Found to be Leaking Excessively Through  
 Nameplate Rivet Hole  
 Operating Experience 15204, Failure of the Essential Service Water Strainer Due to a Lack of  
 appropriate Preventative Maintenance  
 Action Request 64419 IN 2002-12 Submerged Safety Related Cables

#### Work Orders (WO)

65481 Inspect BFD Relays (CCW Pump B & C Alarm Relays)  
 131678 Inspect BFD Relays (CCW Pumps B & C Alarm Relays)  
 163431 B CCW Pump Seals Leaks - Inboard Seal has a slight spray  
 177461 Outboard Pump Seal of C CCW Pump has numerous leaks  
 192364 FT 613 Needs to be vented  
 192459 C CCW Pump has inboard seal leak  
 195584 FT 613 Needs to be vented  
 232418 C CCW Pump outboard bearing has slight seal leakage  
 298782 Inspect BFD Relays (CCW Pump B & C Alarm Relays)  
 334312 App 002E1 Alarms Too Late  
 334513 Lo Flow Alarm for RHR Pump A  
 335741 App 001D1 alarms Too Early  
 355972 A CCW Pump Control Switch Clearing  
 431084 A CCW Pump Failed to Start  
 431604 Replace Secondary Contact on 52/33C  
 554999 CC-749A would not stroke from RTGB  
 611353 Seal Leakage from RHR Pump B  
 108913 SI Pump A, EC 52753, Pipe Struts Fabrication Error  
 376024 Insufficient insulation removed for ISI inspection of A cold leg weld  
 568118 SI Pump A discharge check valve SI-879A bonnet leaking  
 383935 Exhaust Leaks on EDG B  
 98556 B EDG Standby Circulating Water Pump Has a Seal Leak. Rework is Suspected.  
 420204 Civil/Mechanical Detailed Inspection  
 411837 Assist [Robinson Engineering Section] in Detailed Inspection of Electrical Manhole  
 417108 During PM on 52/25B Found Low Megger Readings on SW Pump D  
 559609 SI-879A Leakage  
 561687 SI Pump A Discharge Check Valve Leakage  
 292136 OST-151-3 (QL) Safety Injection System Component Test  
 26312 OST-151-2 (QL) Safety Injection System Component Test  
 342963 OST-151-2 (QL) Safety Injection System Component Test  
 292135 OST-151-2 (QL) Safety Injection System Component Test

Employee Concerns Reports (ECR)

ECR 44745  
 ECR 44548  
 ECR 41926  
 ECR 41951  
 ECR 41813

Procedures

Nuclear Generation Group Standard Procedure, ADM-NGGC-0104, Work Management Process, Revision 27  
 Nuclear Generation Group Standard Procedure, ADM-NGGC-0203, Preventive Maintenance and Surveillance Testing Administration, Revision 5  
 Nuclear Generation Group Standard Procedure, ADM-NGGC-0204, Work Management (WO Scheduling), Revision 0  
 Nuclear Generation Group Standard Procedure, CAP-NGGC-0205, Significant Adverse Condition Investigation, Revision 1  
 Nuclear Generation Group Standard Procedure, CAP-NCCG-0200, Corrective Action Program, Revision 11  
 Plant Operation Manual (POM), Vol. 1, Part 1, PLP-128, Degraded Operable SSCs, Revision 1  
 POM, Vol. 3, Part 9, OST-943, Service Water to Safety Related Equipment Valve Position Verification, Revision 11  
 General Plant Procedure, GP-002, Cold Shutdown to Hot Subcritical at No Load Temperature-Average, Rev. 93  
 General Plant Procedure, GP-007, Plant Cooldown from Hot Shutdown to Cold Shutdown, Rev. 64  
 CM-611, Governor for the Emergency Diesel Generators A & B, Rev. 13  
 CM-628, Emergency Diesel Generator Cylinder Liner Adapters Maintenance, Rev. 10  
 Engineering Surveillance Test (EST), EST-140, Leak Test for ECCs Boundary Valves(Refueling)  
 PM-409, Bridge and Insulation Resistance Testing of Electrical Equipment, Rev. 9  
 PM-479, Motor Testing, Rev. 4  
 SFS-001, IF-300 Shipping Cask Operations, Rev. 38  
 HPP-318, Decon of the IF-300 Cask, Rev. 6  
 HPP-25, Shipping and Receiving the IF-300 Cask, Rev. 24  
 MMM-001, Maintenance Administration Program, Rev. 63  
 OMM-001-12, Minimum Equipment List and Shift Relief, Rev. 38  
 CM-102, Nozzle Relief Valve Maintenance , Rev. 31  
 EST-112, Pressure, Safety , and Relief Valve Bench Testing, Rev. 20

Drawings

G-190678, Yard Duct Runs, Dated March 29, 1967  
 G-190199, Service and Cooling Water System Flow Diagram, Sheet 2 of 13, Rev. 63  
 G-190199, Service and Cooling Water System Flow Diagram, Sheet 6 of 13, Rev. 40  
 G-190204-A, Emergency Diesel Generator System Flow Diagram, Sheet 3 of 3, Rev. 18  
 5379-376 Sheet 1 Component Cooling Water System Flow Diagram, Rev. 36  
 5379-376 Sheet 2 Component Cooling Water System Flow Diagram, Rev. 31

5379-376 Sheet 3 Component Cooling Water System Flow Diagram, Rev. 23  
 5379-376 Sheet 4 Component Cooling Water System Flow Diagram, Rev. 31  
 5370-1082 Sheet 1 Safety Injection System Flow Diagram, Rev. 41  
 5370-1082 Sheet 2 Safety Injection System Flow Diagram, Rev. 43  
 5370-1082 Sheet 3 Safety Injection System Flow Diagram, Rev. 25  
 5370-1082 Sheet 4 Safety Injection System Flow Diagram, Rev. 27  
 5370-1082 Sheet 5 Safety Injection System Flow Diagram, Rev. 38

#### New Work Tickets From SI System Walkdown

00165967 Boric Acid on FI-11096 High Side Vent  
 00165971 Boric Acid on SI-Pmp-A Discharge Drain  
 00165974 Boric Acid on SI-Pmp-C Inboard Seal  
 00165975 Boric Acid on Drain for PI-492  
 00165978 Boric Acid on SI-870B Stem

#### Cancelled Engineering Changes (E/Cs)

48984 Evaluation of Cable Splice Requirements for RHR Pump Motors  
 51861 Replace CC-731, 717, 738 Due to Unavailable Spare Parts  
 47258 Standby Jacket Cooling Pumps  
 47072 SI Pipe Upgrade and SI-857B Removal  
 54781 Increased Thinning and Two-Phase Coat Application  
 58306 Install Guard Over Limit Switch on ES-10 Per CA for Significant AR 124140  
 56487 Replacement Valve Evaluation for CC-738  
 51930 Review Technical Manual 728-144-37  
 51925 Review Technical Manual 762-209-38  
 51929 Review Technical Manual 755-655-31  
 51924 Review Technical Manual 728-011-52  
 52050 Review Technical Manual 727-922-94  
 47090 Namco EQ Test Report Review  
 47242 Review of Rosemount Qualification Documents

#### Other

Refueling Outage 22 Report, Report Number 123746-14, Dated 8/4/04  
 Engineering Service Request (ESR) Number 9700431, Service Water D Motor/Cable Megger  
 Reading Evaluation  
 Operator Work-Around 04-11, Deepwell Pump B  
 Degraded Operable SSC Disposition 04-010, Deepwell Pump B Motor  
 IEEE Standard 141-1976, Cable Systems  
 IEEE Standard 43-2000, IEEE Recommended Practice for Testing Insulation Resistance of  
 Rotating Machinery  
 Self-Assessment Report Number 15262, Engineering Motor Program  
 Service Water System Health Report, Dated 7/26/2004  
 R-SE-04-01, Robinson Nuclear Plant Self Evaluation Assessment Report, dated  
 September 22, 2004  
 Assessment Number 76934, Corrective Action Program Cross-functional Self Assessment,  
 April 7-11, 2003

Assessment Number 54779, Corrective Action Program, July 8-August 8, 2002  
Nuclear Assessment Section Report RR-CA-02-01, Round Robin Assessment of Corrective  
Action Program for Robinson and Harris Nuclear Plants, dated August 8, 2002  
Site-Wide Analysis of Condition Reports for Performance Trends, dated September 1 through  
December 31, 2003  
Site Wide Analysis of Condition Reports for Performance Trends, dated January 1 through  
March 31, 2004  
Maintenance Rule Performance Summary for system 4080 Component Cooling Water system  
31-August-04  
Maintenance Rule Event Log Report for System 4080 Component Cooling Water System 31-  
August-04  
Completed Work Orders for System 4080 CCW for 8/31/2004  
NRC Inspection Manual Part 9900 Technical Guidance Section 6.13  
ASME Code Section III Appendix F Section F-1310C  
System Health Report For System 4080 Component Cooling Water dated 7-26-04  
CCW Sampling Results Tritium Analyses for 2002-2004  
System Health Report For System 2080 and 2080C Safety Injection and Containment Spray  
CP&L Laboratory Lube Oil Report Unit 2C SI Pump Outboard Bearings  
SI System Walkdown Report September 2004  
SI System Work Orders dated 8/31/2004  
Material Evaluation 06517R00 Velan Swing Check Valve  
Vendor Manual 728-144-37 Westinghouse Air Circuit Breaker DB-50, DB-75, and DB-100  
Westinghouse Technical Bulletin W-TB-99-05, DB-50 Breaker Minimum Trip Force and  
Seismic Enhancements  
HB Robinson Plant Valve Test Data for CC-729  
Robinson Technical Training Relief/Safety Relief/Safety Valve Maintenance MEL0013R Rev. 1  
Engineering Change (E/C) 47104 Rev.0  
H. B. Robinson Plant Valve Test Data For SI-871