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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO NRC INSPECTION REPORT NO. 50-261/89-16

Gentlemen:

The subject Inspection Report provided the results of an Emergency Operating Procedures (EOP) Inspection which was conducted at Carolina Power and Light Company's (CP&L) H. B. Robinson, Unit No. 2 (HBR2) on September 18 through 29, 1989. This Inspection identified no violations or deviations; however, a number of deficiencies were identified which were designated as Inspector Follow-up Items (IFI). In accordance with the instructions provided within the cover letter transmitting the Inspection Report, Attachment I provides a response to each IFI including a statement of the intended corrective action and a date by which the review and corrective action will be complete. The overall upgrade to the EOP program represents a significant commitment of resources and manpower to complete. The total project involves revising the programmatic procedures, then implementing those procedures into upgraded emergency and abnormal operating procedures. The total project duration is dependent upon augmenting the HBR2 staff to complete the procedure improvements and to implement the upgraded verification and validation process to ensure the procedures are written consistent with the plant design and the operators who implement the procedures. The submittal of this information completes CP&L's response to the subject Inspection Report.

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Should you have any questions concerning this submittal, please contact
Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



C. R. Dietz

Manager

Robinson Nuclear Project Department

EMS:lht

Attachments

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

ATTACHMENT I

RESPONSE TO NRC INSPECTION REPORT NO. 50-261/89-16

1. Weaknesses Identified with Management Control of EOPs

This item was not designated as an IFI, but was identified as an overall concern in that the existing management control system permitted EOP deficiencies to occur and failed to properly identify them. A number of the specific items identified in the Inspection Report were previously recognized by CP&L management as areas needing improvement. Revisions had been initiated to the EOP writer's guide, an upgrade to the Plant Specific Technical Guidelines was in progress, and the EOP Verification and Validation process was being evaluated. Specific improvements which will be implemented in these areas are described within our responses to the associated Inspector Follow-up Items.

Once implemented, these upgraded programmatic controls will ensure the requisite level of continued quality and usability. These controls will also ensure that the EOPs are consistent with plant design and operator training. The necessary level of detail to ensure technically correct and "user-friendly" EOPs will be provided within the upgraded programs for EOP development and maintenance.

2. Availability of Equipment

Although not identified as an IFI, this item was identified within the Inspection Report as a concern in that "the availability and prestaging of needed equipment was weak for some required actions; Appendix B, paragraphs VI.14.h and k and II.1.n." CP&L acknowledges the importance of maintaining as readily available the equipment and references which are required to accomplish EOP steps. It is also acknowledged that these support materials must be of good quality and maintained in proper condition. To most efficiently and effectively address this concern, the availability and prestaging of equipment will be reviewed in conjunction with the review of Appendix B items as required by IFI 50-261/89-16-04. In this way, as EOP steps are reviewed and revised, the necessary actions can be taken to ensure that the needed hardware and references will be available. As such, completion of this activity will be in accordance with the schedule provided for the completion of review of Appendix B items as provided in the response to IFI 50-261/89-16-04.

3. Plant Design Deficiencies

This item was not designated as an IFI, but was identified as an overall concern in that certain plant design weaknesses inhibited the operator's ability to respond to specific events or equipment failures. It is acknowledged and agreed that design deficiencies should not be addressed by inadequate or burdensome procedures. However, there are situations where procedural "fixes" are the best interim action to allow safe operation of plant systems, despite the existence of certain system design deficiencies.

As design deficiencies are identified, they have been and will continue to be evaluated to determine the appropriate compensatory or corrective actions. The management of HBR2 will continue to assess proposed corrective actions and required procedural "fixes" to limit the burden placed on operators and procedures.

4. Develop a New PSTG (IFI 50-261/89-16-01)

The HBR2 EOPs are based on the Westinghouse Owners Group (WOG) Emergency Response Guidelines (ERG). The present Plant Specific Technical Guidelines (PSTG) consist of the ERGs and the H. B. Robinson Transition Document. This arrangement has proved difficult to maintain and has not been effective in providing a sound technical basis for the plant specific EOPs.

In order to better satisfy the requirement for a usable, maintainable PSTG, a well-defined PSTG will be developed which will provide the basis for the plant specific EOPs. The upgraded PSTG will document the differences between HBR2 and ERG Low Pressure Reference Plant, and will include the basis for setpoints used in the EOPs. A step deviation document will be developed to address the transition from the generic technical guidelines (ERGs) to the PSTG. The upgraded PSTG will be used in conjunction with the revised EOP writer's guide to develop the upgraded EOPs. The upgraded PSTG will be completed by September 28, 1990.

5. Develop an AOP Writers Guide (IFI 50-261/89-16-02)

The HBR2 Abnormal Operating Procedures (AOP) are event-based procedures used to address plant specific abnormal operating conditions that do not result in a reactor trip or safeguards actuation. The present AOPs have not been developed or maintained using the programmatic procedures which are typical of EOP programs, e.g., writer's guide or verification and validation process. The AOPs have in the past been validated through simulator exercises or actual plant transients, however, they are not currently subjected to the formal verification and validation process which is associated with the EOPs.

It is acknowledged that several of the events addressed by the AOPs may be precursors to entry into the EOPs, and that a well-defined interface should be established between the AOPs and EOPs. To this end, an AOP writer's guide will be developed to formalize the format, action verb definitions, methods of transition, and use of logic statements as applicable to the AOPs. The AOP writer's guide will also clearly define the interaction between the AOPs and EOPs. The AOP writer's guide will be developed and approved by July 27, 1990.

6. Review Each Appendix D Item (IFI 50-261/89-16-03)

Appendix D to the Inspection Report contains observations of instances where EOP Writer's Guide application to the EOP did not result in the proper degree of consistency between component and procedure nomenclature. This is attributable to the lack of a precisely defined method for referencing equipment nomenclature.

In conjunction with the upgrade of the EOP writer's guide as described in our response to IFI 50-261/89-16-05, and the development of the AOP writer's guide as described in our response to IFI 50-261/89-16-02, a well-defined methodology will be developed to address the referencing of equipment nomenclature. This methodology will be applied to our review and evaluation of the Appendix D items.

The results of this review and evaluation will be integrated into the overall upgrade of the EOPs and AOPs. As such, appropriate changes will be developed and implemented by December 20, 1991.

7. Review Each Appendix B Item (IFI 50-261/89-06-04)

Appendix B to the Inspection Report contains technical and human factors comments and observations. This Appendix provided a number of discrepancies in the areas of technical adequacy, writer's guide adherence, and human factors.

These discrepancies will be reviewed and evaluated in conjunction with the programmatic upgrade of the EOPs and AOPs. Appropriate changes will be developed and implemented by December 20, 1991.

8. Review Each Appendix C Item (IFI 50-261/89-16-05)

Appendix C to the Inspection Report contains writer's guide comments and observations. This Appendix identified deviations from and inadequacies in the EOP writer's guide. Also, this Appendix listed inconsistencies in the application of human factors principals and the presentation of information between the AOPs and EOPs.

The applicable comments from this Appendix will be reviewed and evaluated as part of an upgrade of the EOP writer's guide. The upgraded EOP writer's guide will be developed and implemented by March 30, 1990.

The specific AOP comments from this Appendix will be reviewed and evaluated in conjunction with the development of the AOP writer's guide as described in our response to IFI 50-261/89-16-02.

The overall upgrade of the EOPs and AOPs will include review and evaluation of Appendix C comments and concerns. The upgrade of the EOPs and AOPs is scheduled to be completed by December 20, 1991.

9. Correct V&V Deficiencies (IFI 50-261/89-16-06)

The HBR2 EOP writer's guide provides the requirements for the Verification and Validation (V&V) process. A verification checklist is completed prior to procedure approval and the validation is performed by Control Room walk-through or simulator validation. The present requirements do not specify a time limit for completion of the validation process, and do not address verification against the PSTG.

To correct the identified V&V deficiencies and upgrade the V&V process, specific limitations will be included regarding the performance of verification and validation activities. This will include the use of a multidisciplinary team approach, and comparison with the plant specific guidance provided by the upgraded PSTG. The upgrade of the Verification and Validation process will be completed by December 21, 1990.

10. Review Memorization of Operator Immediate Actions (IFI 50-261/89-16-07)

The HBR2 philosophy relative to EOP immediate operator actions will be re-evaluated to ensure consistent application of ERG guidance. Changes in this philosophy will be implemented in the upgraded EOP writer's guide as discussed in IFI 50-261/89-16-05, and appropriate operator training completed by June 15, 1990.