

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR:9009280038 DOC.DATE: 90/09/21 NOTARIZED: NO DOCKET #
 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH.NAME AUTHOR AFFILIATION
 DIETZ,C.R. Carolina Power & Light Co.
 RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Submits supplemental response to violations noted in Insp Rept 50-261/90-11.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTR	ENCL		LTR	ENCL
	PD2-1 PD	1	1	LO,R	1	1
INTERNAL:	AEOD	1	1	AEOD/DEIIB	1	1
	AEOD/TPAD	1	1	DEDRO	1	1
	NRR MORISSEAU,D	1	1	NRR SHANKMAN,S	1	1
	NRR/DLPQ/LPEB10	1	1	NRR/DOEA DIR 11	1	1
	NRR/DREP/PEPB9D	1	1	NRR/DRIS/DIR	1	1
	NRR/DST/DIR 8E2	1	1	NRR/PMAS/ILRB12	1	1
	NUDOCS-ABSTRACT	1	1	OE DIR	1	1
	OGC/HDS1	1	1	<u>REG FILE</u> 02	1	1
	RGN2 FILE 01	1	1			
INTERNAL:	NRC PDR	1	1	NSIC	1	1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 21 ENCL 21⁰

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S



Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

SEP. 21 1990

Robinson File No: 13510E

Serial: RNP/90-3060

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/90-11: SUPPLEMENTAL RESPONSE

Gentlemen:

Carolina Power and Light Company (CP&L) provides this supplemental response to the Notice of Violation identified by NRC Inspection Report No. 50-261/90-11. The purpose of this response is to describe the Technical Specification Review Program, and its implementing schedule, which is being conducted as action to prevent further violations of the nature described in the subject inspection report. This submittal also satisfies a commitment made in LER-90-005-01.

In June, 1990, the Plant General Manager requested the Corporate Nuclear Safety Section (CNS) to assist the Plant Nuclear Safety Committee by conducting an independent assessment of perceived weaknesses identified in the H. B. Robinson Technical Specification Surveillance Program. CNS developed a three phase plan to assist the PNSC in this respect. A description of the plan is as follows:

Phase 1 consisted of gathering data and data analysis to determine the extent of the perceived concern. Data was extracted from previous instances of Technical Specification noncompliance, and the current administrative controls relative to the surveillance program were reviewed. The goal of Phase 1 was to assess the relative confidence level that the Technical Specification Surveillance Program is thorough and comprehensive.

The purpose of Phase 2 of the project is to determine the resources required for implementing the project and to provide a recommendation to Robinson Management on the final scope and methodology for accomplishing Phase 3.

9009280038 900921
PDR ADOCK 05000261
PDC

LEO
1/0

Phase 3 consists of performance of an in-depth review of the programmatic and procedural adequacy of the H. B. Robinson Technical Specification Surveillance Program for the scope determined as a result of the first two phases. The results of the Phase 1 efforts were reviewed by the Plant Nuclear Safety Committee on September 19, 1990. The findings include a number of potential programmatic weaknesses with the Technical Specification Surveillance program. However, no failures to perform Technical Specification surveillance have been identified from the Phase 1 efforts, nor have any additional Technical Specification violations been found.

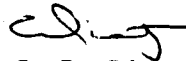
The scope of Phase 3 is to improve the Technical Specification Surveillance Program in those areas identified by Phase 1. This effort includes programmatic enhancements in areas of administrative controls and Technical Specification Interpretation processes, development of a total Technical Specification cross reference document, and the performance of an in-depth procedural verification of Technical Specification Table 4.1-1. It should be noted that only Table 4.1-1 is currently included in the scope of the project because this section has historically been the source of previous Technical Specification compliance concerns.

Phase 3 is currently scheduled to begin in January 1991. The milestones for completion of this project include having programmatic enhancements in place and the Cross Reference document upgraded to include Table 4.1-1 specifications by December 31, 1991, and procedural verification of Table 4.1-1 items complete by June 30, 1992. A detailed project plan will be proposed and will be available for review by January 31, 1991.

The PNSC review of the recommended scope of the project concluded that the level of detail for Phase 3 was appropriate. In addition, the Committee concluded that with the actions described above, recurrence of additional inadequate surveillance testing or Technical Specification non-compliance will be prevented.

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

RDC:

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