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SUBJECT: Suppls 891208 response to deficiencies noted in Insp Rept 50-261/89-16 re EOPs. Activities associated w/upgrade of EOP setpoint document will be completed by 91231 & will include plant-specific calculational basis for certain setpoints.

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

Gentlemen:

NRC Inspection Report No. 50-261/89-16 provided the results of an Emergency Operating Procedures (EOP) Inspection which was conducted at 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). By letter dated December 8, 1989, and in accordance with the instructions provided within the cover letter transmitting the Inspection Report, Carolina Power and Light Company (CP&L) provided a response to each IFI which included a statement of the intended corrective action and a date by which the review and corrective action would be complete.

In response to IFI 50-261/89-16-01, a commitment was made to develop well-defined Plant Specific Technical Guidelines (PSTG) to provide the basis for the plant specific EOPs. The upgraded PSTG was to document the differences between HBR2 and the Emergency Response Guidelines (ERG) Low Pressure Reference Plant, and was to also include the basis for setpoints used in the EOPs. A step deviation document was to be developed to address the transition from the generic technical guidelines (ERGs) to the PSTG. The upgraded PSTG was to be completed by September 28, 1990.

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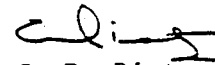
As documented within the plant's internal regulatory tracking system, the upgraded PSTG was completed by the committed due date. However, subsequent reviews have identified that the EOP Setpoint Document does not provide a plant specific calculational basis for certain setpoints used within the EOPs. Further, engineering judgement was used instead of a calculational basis for several setpoints. Although the Setpoint Document is only one part of the series of documents that constitutes the upgraded PSTG, the identification of these discrepancies indicates that the commitments made in response to IFI 50-261/89-16-01 have not been fully met. These discrepancies and the failure to fully meet the commitments made in response to the IFI were documented within Inspection Report No. 50-261/91-01.

As documented within CP&L's response to Inspection Report No. 50-261/91-01, dated April 3, 1991, a calculational basis for EOP setpoints will be developed by the end of 1991. A contract has already been implemented to provide the required supplemental resources to complete this activity by the revised due date. These resources have extensive experience with Westinghouse Pressurized Water Reactors, the Westinghouse ERGs, and have a working knowledge of the HBR2 Emergency Operating Procedures and EOPs in use at other sites. Initial tasks already in progress include the compilation of data to support completion of upgraded instrument uncertainty calculations. Ultimately, the EOP Setpoint Document will be completely rewritten to include a proper calculational basis for EOP setpoints, and to ensure that a consistent methodology is applied throughout the Setpoint Document.

As stated above, activities associated with the upgrade of the EOP Setpoint Document will be completed by December 31, 1991. Completion of this activity will satisfy the commitments made in response to IFI 50-261/89-16-01. Also, this submittal satisfies the commitment made within CP&L's response to Inspection Report No. 50-261/91-01 to provide a supplemental response to Inspection Report No. 50-261/89-16 by May 31, 1991.

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

Very truly yours,



C. R. Dietz

Manager

Robinson Nuclear Project Department

CTB:td