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SUBJECT: Suppls 910518 response to nonconformances/weaknesses noted in Insp Rept 50-261/90-08. Corrective actions: procedures will be revised by 911231 to validate 132 limit switches for 66 containment isolation valves & 25 other instruments.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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SUPPLEMENTAL RESPONSE TO NRC INSPECTION REPORT NO. 50-261/90-08

Gentlemen:

The subject Inspection Report provided the results of a special, announced inspection conducted at Carolina Power and Light Company's (CP&L) H. B. Robinson Unit No. 2 (HBR2) in the area of conformance to Regulatory Guide (RG) 1.97. This inspection identified no violations or deviations, however, commitments were made in response to certain weaknesses or concerns. These commitments were documented within the Inspection Report, and within a CP&L letter, dated May 18, 1990, which documented verbal commitments made during telephone conferences between CP&L and NRC Region II personnel on April 26 and May 3, 1990.

One of the identified weaknesses involved the calibration program for RG 1.97 instruments which provide input to the Emergency Response Facility Information System (ERFIS) computer. Specifically, the calibration of certain RG 1.97 instrument channels is performed such that the instrument channel calibration is independent of the calibration of the associated ERFIS input. For the specific channels in question, this practice was considered to be unacceptable based on having taken credit for ERFIS indication or recording for these RG 1.97 instrument loops. Based on this information, the inspectors concluded that the output of these loops to the ERFIS computer should be calibrated to verify the accuracy of the computer output, as is done with the other recorders or indicators being supplied by the instrument loop. As a long-term action to address this weakness, CP&L committed to revise procedures by December 31, 1991, to validate 132 limit switches for 66 containment isolation valves, and 25 various other instruments including the containment water level and containment pressure channels.

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One portion of this commitment has been addressed by the development of a new Operations Surveillance Test (OST) which will validate ERFIS output versus Control Board indication for 132 limit switches associated with the 66 containment isolation valves. This OST is scheduled for approval on or before December 31, 1991, which will satisfy this aspect of the commitment.

With respect to the validation of the 25 other instrument channels, a multi-disciplinary group has been involved in the examination of possible methods of accomplishing this testing. This group has weighed the development of new surveillance procedures against the incorporation of this surveillance testing into existing plant procedures. Ultimately, the decision was made to develop a new procedure to accomplish this testing. However, due to the delays associated with the evaluation of possible alternatives, and other delays experienced as a result of higher priority work activities, the development and implementation of this new procedure will not be completed by December 31, 1991. The revised date for approval of this procedure is July 31, 1992.

Should you have any questions regarding this matter, please do not hesitate to contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



C. R. Dietz
Vice President

Robinson Nuclear Project Department

CTB:dwm

cc: Mr. S. D. Ebnetter
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INPO