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SUBJECT: Agrees w/recognition of quantitative ratings of SALP reflecting overall performance of plant re response to NRC Insp Rept 50-261/91-10.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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RESPONSE TO NRC INSPECTION REPORT 91-10:
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Gentlemen:

Carolina Power and Light Company (CP&L) has reviewed the Systematic Assessment of Licensee Performance (SALP) Board Report forwarded by your letter of May 31, 1991. This report provided results from the evaluation period January 1, 1991, through March 30, 1991.

The Company agrees with and appreciates recognition of the quantitative ratings of the SALP Board which reflect the overall performance of the Robinson Project. In particular, CP&L was pleased to note the recognition of continued strong performance and management attention in the areas of security and radiological controls.

CP&L contends that the Commission should recognize a positive improving trend in Operations and Engineering Support. Operations has had an aggressive program in leak identification and fuel integrity as indicated by H. B. Robinson's best quartile appearance for volume of radwaste and fuel reliability. Through the Corrective Action Program, Operations has ardently pursued resolution of near misses. The results of these efforts is seen in the 1990 Unplanned Safety System Actuations (0) and Forced Outage Rate (1.7). The material condition of the plant has improved consistently largely through the efforts of Operations and Technical Support. These noted efforts were consistent throughout the assessment period.

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Additionally, Robinson personnel participated in the investigative team that reviewed the Brunswick fire and returned with many lessons learned. Key lessons were reviewed with regard to problems encountered at Brunswick and several actions initiated, mostly dealing with Fire Brigade performance and support. These efforts resulted in excellent response by the Fire Brigade to the February 14th fire in the Containment Vessel.

In the area of Engineering Support, the System Engineer concept has shown measurable benefits. The Split Pin Replacement and Upper Internals Project were proven examples of this concept to assure continued positive performance in plant and fuel reliability for the future. Plant secondary chemistry also improved due to the System Engineer concept by reducing air in leakage. A System Team is responsible for the considerable upgrade in the Radiation Monitoring System. In general, plant, fuel, and safety system reliability have improved due to an concerted effort by a qualified staff and management attention. CP&L believes that the strong showing of the Licensed Operators in the Licensed Operator Requalification Examinations not only reflects an excellent training program but is also indicative of a strong and improving Operations program. CP&L management has taken several steps to enhance Engineering Support, especially with Nuclear Engineering Department (NED) involvement onsite. NED has taken the lead on material procurement and the development of modifications. NED also participates with the site on resolution and root cause analysis of site issues such as service water pipe corrosion and reactor head work. NED plays a critical role in maintaining design basis and in relieving the burden of the System Engineer, thereby assuring a cohesive Engineering Support Group. The efforts by both NED and Technical Support are ongoing enhancements that have been positively consistent during the assessment period. Due to the noted improvements and continuing progress towards the planned goals, CP&L believes the written report should more clearly reflect the improving trends in Operations and Engineering/Technical Support.

CP&L remains committed to further improvements in all functional areas and appreciates the opportunity to respond to this assessment. Sustained improvement through proactive management involvement and oversight will provide assurance and that this performance trend will be sustained with measurable, auditable results.

Very truly yours,

C. R. Dietz
Manager
Robinson Nuclear Project Department

PCHJ:sgk

cc: S. D. Ebneter
L. W. Garner