JUL 22 1991

Office Copy

Docket No. 50-261
License No. DPR-23

Carolina Power and Light Company
ATTN: Mr. Lynn W. Eury
Executive Vice President
Power Supply
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(NRC INSPECTION REPORT NO. 50-261/91-10)

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) Report for your Robinson facility which was sent to you on May 31, 1991; our meeting of June 11, 1991, at which we discussed this report; and your written comments dated July 9, 1991, relative to the report.

Although your July 9, 1991 letter indicates that you agree with the quantitative ratings of the Initial SALP Report, it contends that the report should have recognized an improving trend in the functional areas of operations and engineering/technical support. In light of your specific comments, a review of these two functional areas was subsequently conducted. Like the initial assessment, this subsequent review could not clearly discern definite improving trends which, if continued, may result in changes in these areas' future performance ratings. Accordingly, changes to the Initial SALP Report are not considered necessary.

Enclosed is our summary of the June 11, 1991 meeting; a copy of the SALP slides; your response dated July 9, 1991; and a revision to the Initial SALP Report which constitutes the Final SALP Report.

No reply to this letter is required; however, should you have any questions concerning these matters, I will be pleased to discuss them with you.

Sincerely,

Original Signed by
Stewart D. Ebneter

S. D. Ebneter
Regional Administrator

Enclosures: (See page 2)

4/A

IE40
1/1

JUL 22 1991

Enclosures:
1. June 11, 1991
   Meeting Summary
2. June 11, 1991
   SALP Slides
3. CP&L Letter
   Dated July 9, 1991
4. Revision Sheet

cc w/encls:
C. R. Dietz, Manager
Robinson Nuclear Project Department
H. B. Robinson Steam Electric Plant
P. O. Box 790
Hartsville, SC 29550

J. J. Sheppard, Plant General Manager
H. B. Robinson Steam Electric Plant
P. O. Box 790
Hartsville, SC 29550

Heyward G. Shealy, Chief
Bureau of Radiological Health
Dept. of Health and Environmental
Control
2600 Bull Street
Columbia, SC 29201

Dayne H. Brown, Director
Division of Radiation Protection
N. C. Department of Environment,
Health & Natural Resources
P. O. Box 27687
Raleigh, NC 27611-7687

McCuen Morrell, Chairman
Darlington County Board of Supervisors
County Courthouse
Darlington, SC 29535

Mr. H. Ray Starling
Manager - Legal Department
P. O. Box 1551
Raleigh, NC 27602

H. A. Cole
Special Deputy Attorney General
State of North Carolina
P. O. Box 629
Raleigh, NC 27602

(cc w/encls cont'd - See page 3)

JUL 22 1991

(cc w/encls cont'd)
Robert Gruber
Executive Director
Public Staff - NCUC
P. O. Box 29520
Raleigh, NC 27626-0520

J. D. Kloosterman, Director
Regulatory Compliance
H. B. Robinson Steam
Electric Plant
P. O. Box 790
Hartsville, SC 29550

bcc w/encls:
Document Control Desk
H. Christensen, RII
R. Lo, NRR

NRC Resident Inspector
U.S. Nuclear Regulatory Commission
Route 5, Box 413
Hartsville, SC 29550

RII:DRP	RII:DRP	RII:DRP	RII:DRS
DVerrelli:els	LReyes	EMarschoff	CJulian
07/17/91	07/17/91	07/19/91	07/17/91
RII:DRSS	RII:DRP	RII:NRR	RII:NRR
BMallett	LGarner	HBerkow	RLo
07/17/91	07/18/91	07/18/91	07/19/91

ENCLOSURE 1

I. Meeting Summary

A. A meeting was held at 1:00 p.m. on June 11, 1991, at the H. B. Robinson Visitor's Center, near Hartsville, South Carolina to discuss the SALP Report for the Robinson facility.

B. Licensee Participants

S. H. Smith, Jr., President & Chief Executive Officer
R. A. Watson, Senior Vice President
C. R. Dietz, Manager, Robinson Nuclear Project
J. S. Sheppard, Plant General Manager

The list of licensee attendees above does not include the large number of Carolina Power and Light (CP&L) Company employees that were present at the SALP presentation. Other CP&L employees in attendance included managers, supervisors, and various plant staff. This large turnout was beneficial to the SALP process and is highly recommended for future presentations.

C. NRC Participants

J. L. Milhoan, Deputy Regional Administrator, Region II (RII)
E. W. Merschoff, Deputy Director, Division of Reactor Projects, RII
G. C. Lainas, Assistant Director for Region II Reactors, NRR
H. O. Christensen, Chief, Project Section 1A, RII
A. J. Mendiola, Acting Director, Project Directorate II-1, NRR
R. N. Lo, Senior Project Manager, NRR
L. W. Garner, Senior Resident Inspector - Robinson, RII
K. R. Jury, Resident Inspector - Robinson, RII
R. E. Carroll, Project Engineer, Project Section 1A, RII

UNITED STATES NUCLEAR REGULATORY COMMISSION

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)

CAROLINA POWER AND LIGHT COMPANY

SALP CYCLE 9

JANUARY 1, 1990
THROUGH
MARCH 30, 1991

H.B. ROBINSON

JUNE 11, 1991

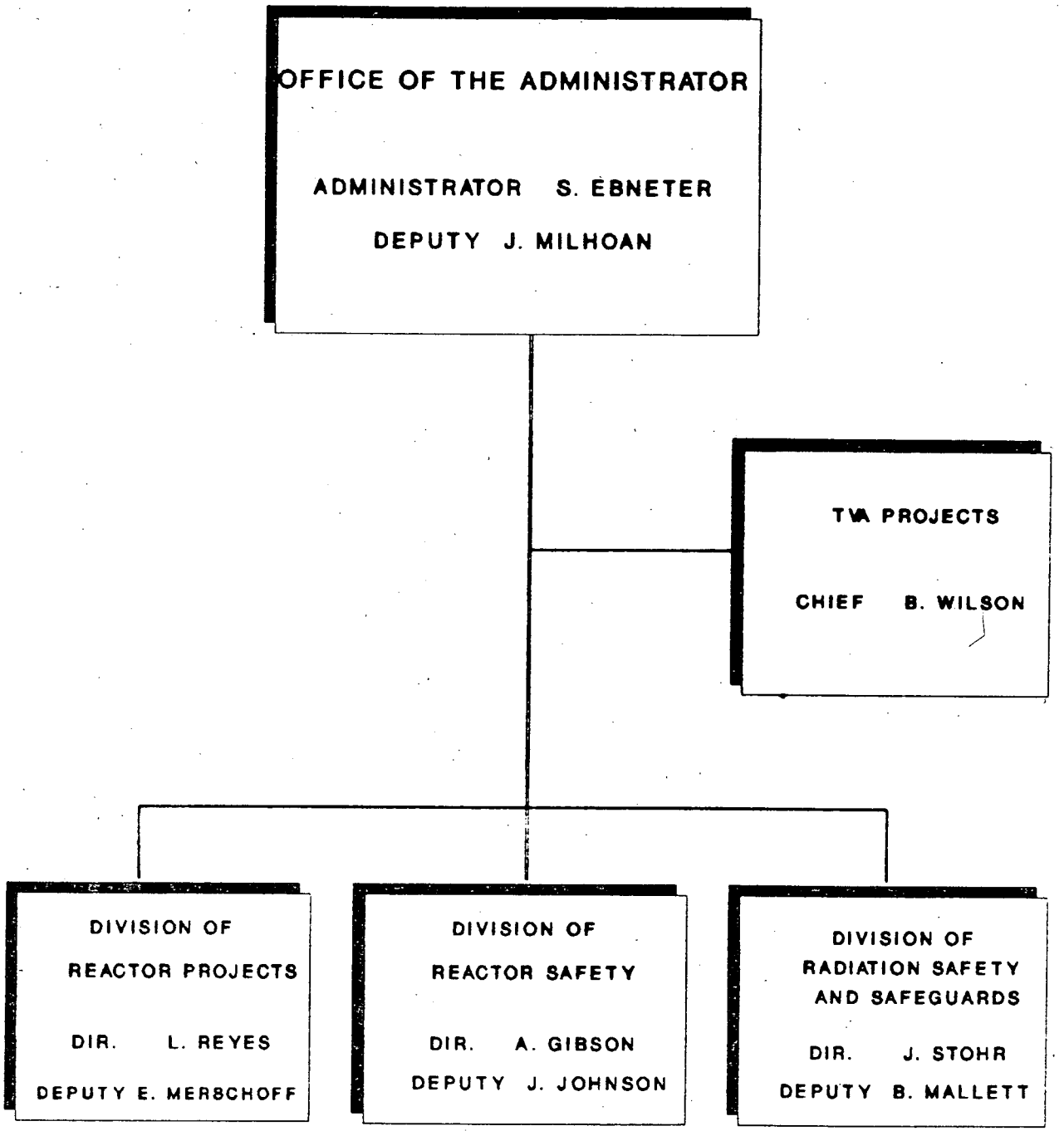
SALP PROGRAM OBJECTIVES

1. IDENTIFY TRENDS IN LICENSEE PERFORMANCE

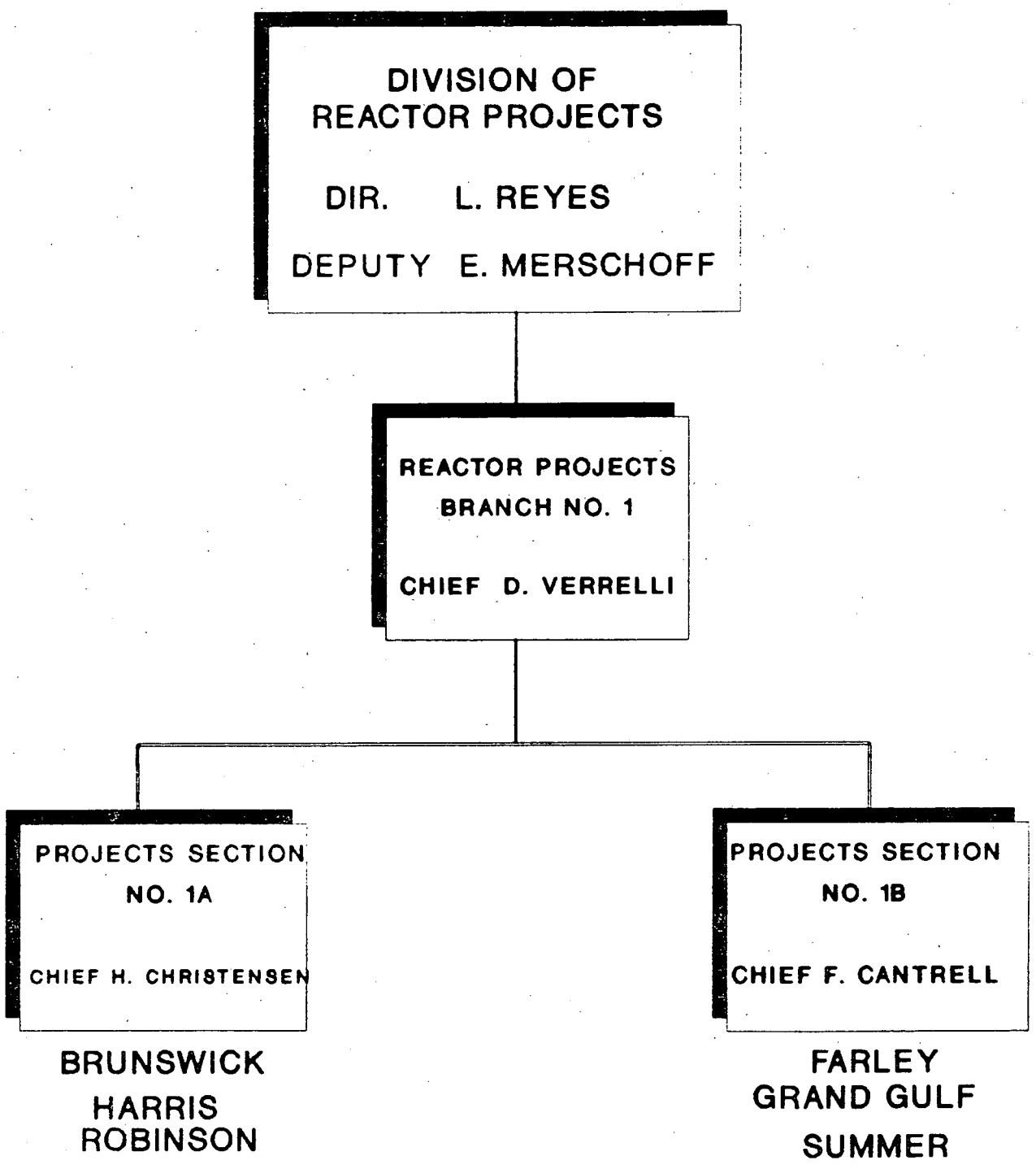
2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES

3. IMPROVE NRC REGULATORY PROGRAM

REGION II ORGANIZATION



DIVISION OF REACTOR PROJECTS ORGANIZATION



NRR ORGANIZATION

OFFICE OF
NUCLEAR REACTOR
REGULATION

DIR. T. MURLEY

ASSOC. DIRECTOR FOR
PROJECTS

J. PARTLOW

DIVISION OF
REACTOR PROJECTS I/II

S. VARGA, DIR. I/II

G. LAINAS, ASST. DIR. II
T. MENDIOLA, DIR. II-1

(ACTING)

R. LO, PROJ. MGR.

ROBINSON

DIVISION OF
REACTOR PROJECTS III/IV/V
AND
SPECIAL PROJECTS

ASSOC. DIRECTOR FOR
INSPECTION AND
TECHNICAL ASSESSMENT

DIVISION OF
ENGINEERING
TECHNOLOGY

DIVISION OF
OPERATIONAL EVENTS
ASSESSMENT

DIVISION OF
REACTOR INSPECTION
AND SAFEGUARDS

DIVISION OF RADIATION
PROTECTION AND
EMERGENCY PREPAREDNESS

DIVISION OF LICENSEE
PERFORMANCE AND
QUALITY EVALUATION

DIVISION OF
SYSTEMS TECHNOLOGY

PERFORMANCE ANALYSIS AREAS FOR OPERATING REACTORS

A. PLANT OPERATIONS

B. RADIOLOGICAL CONTROLS

C. MAINTENANCE/SURVEILLANCE

D. EMERGENCY PREPAREDNESS

E. SECURITY

F. ENGINEERING/TECHNICAL SUPPORT

G. SAFETY ASSESSMENT/QUALITY VERIFICATION

AREA PERFORMANCE

CATEGORY 1

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A SUPERIOR LEVEL OF PERFORMANCE. NRC WILL CONSIDER REDUCED LEVELS OF INSPECTION EFFORT.

AREA PERFORMANCE

CATEGORY 2

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A GOOD LEVEL OF PERFORMANCE. NRC WILL CONSIDER MAINTAINING NORMAL LEVELS OF INSPECTION EFFORT.

AREA PERFORMANCE

CATEGORY 3

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN AN ACCEPTABLE LEVEL OF PERFORMANCE; HOWEVER, BECAUSE OF THE NRC'S CONCERN THAT A DECREASE IN PERFORMANCE MAY APPROACH OR REACH AN UNACCEPTABLE LEVEL, NRC WILL CONSIDER INCREASED LEVELS OF INSPECTION EFFORT.

EVALUATION CRITERIA

1. MANAGEMENT INVOLVEMENT AND CONTROL IN ASSURING QUALITY

2. APPROACH TO IDENTIFICATION AND RESOLUTION OF TECHNICAL ISSUES FROM A SAFETY STANDPOINT

3. ENFORCEMENT HISTORY

4. REPORTING, ANALYSIS AND CORRECTIVE ACTION OF REPORTABLE EVENTS

5. STAFFING (INCLUDING MANAGEMENT)

6. TRAINING EFFECTIVENESS AND QUALIFICATION

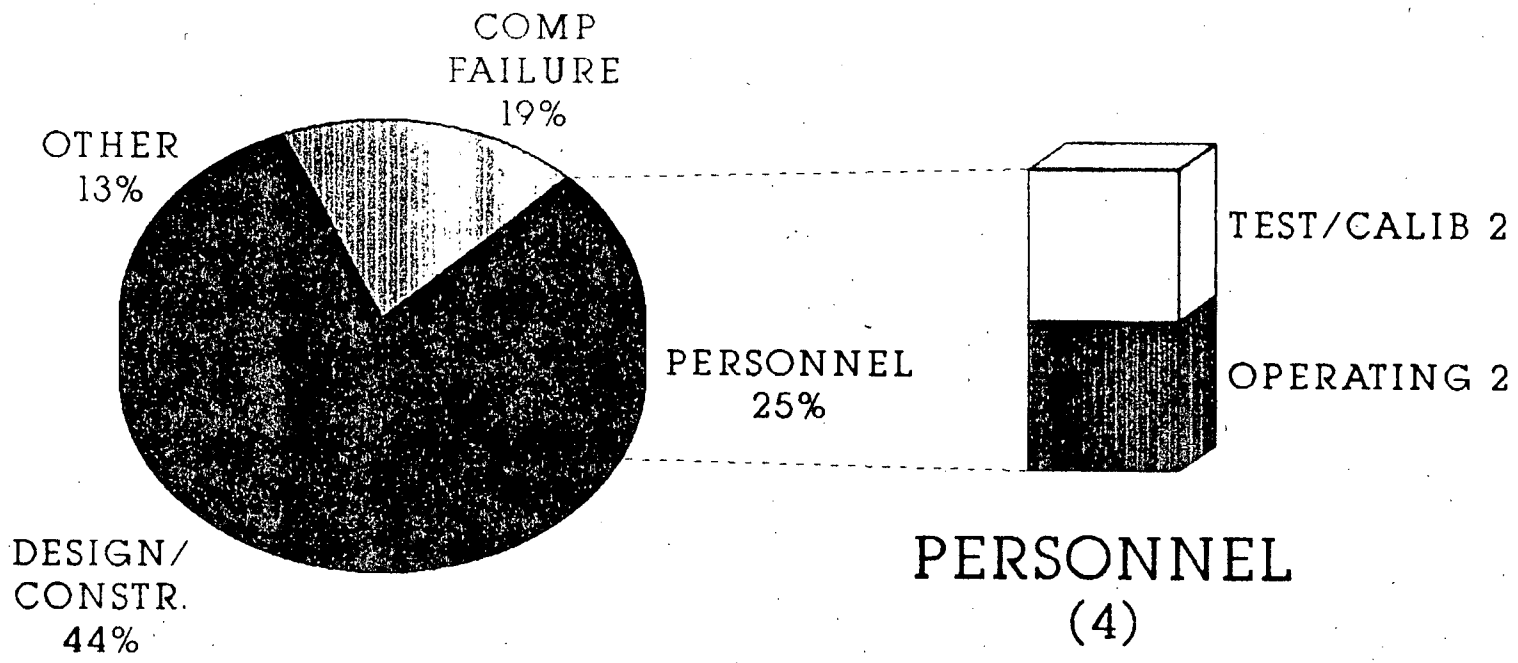
VIOLATION SUMMARY
(CYCLE 9)

JANUARY 1, 1990 THROUGH MARCH 30, 1991

	I	II	III	IV	V
ROBINSON	0	0	0	12	0
REGION II AVE. PER OPERATING UNIT FOR ASSESSMENT PERIOD	0	0	<1	11	<1

ROBINSON

JANUARY 1, 1990 - MARCH 30, 1991
(CYCLE 9)



TOTAL
(16)

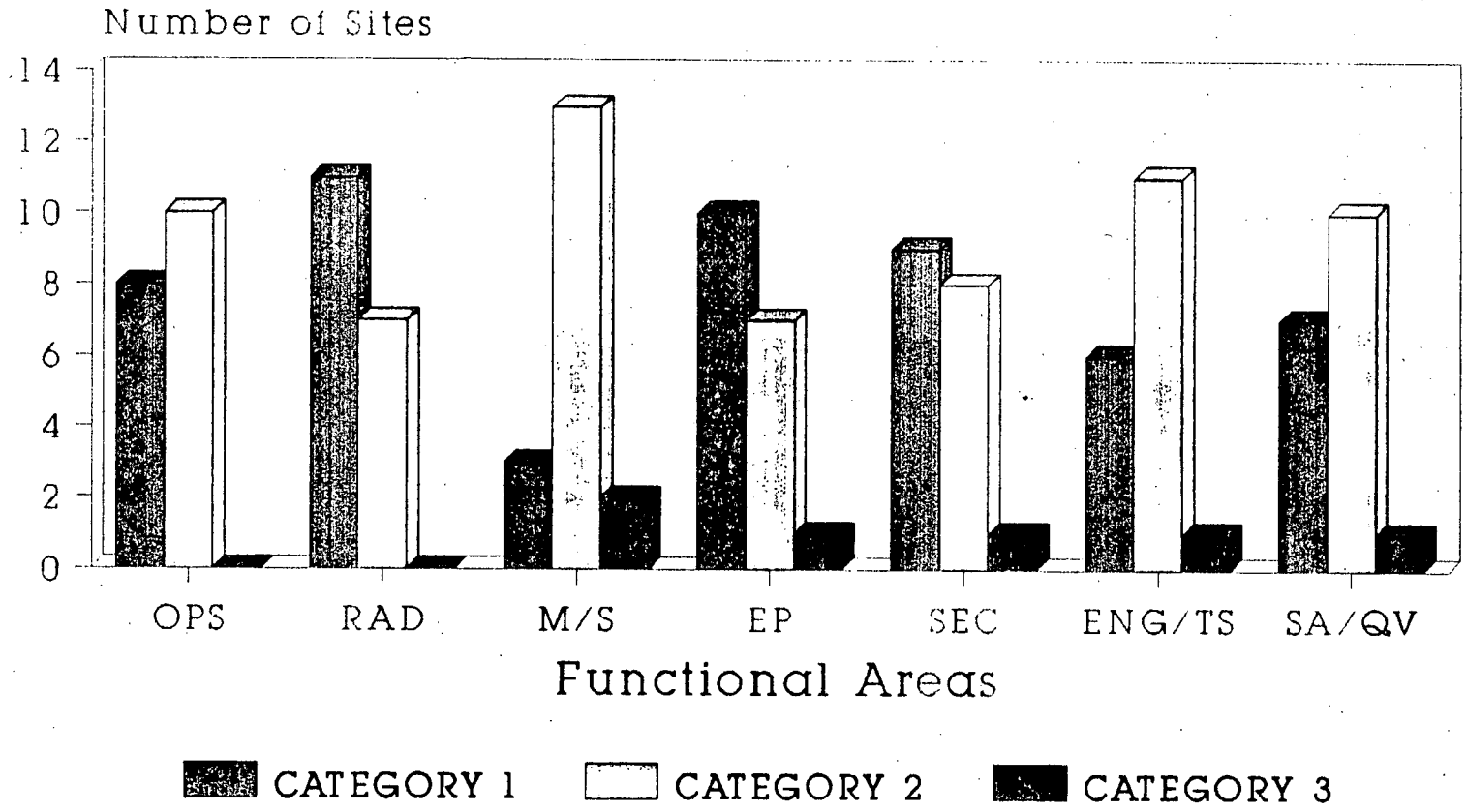
PERSONNEL
(4)

LERs

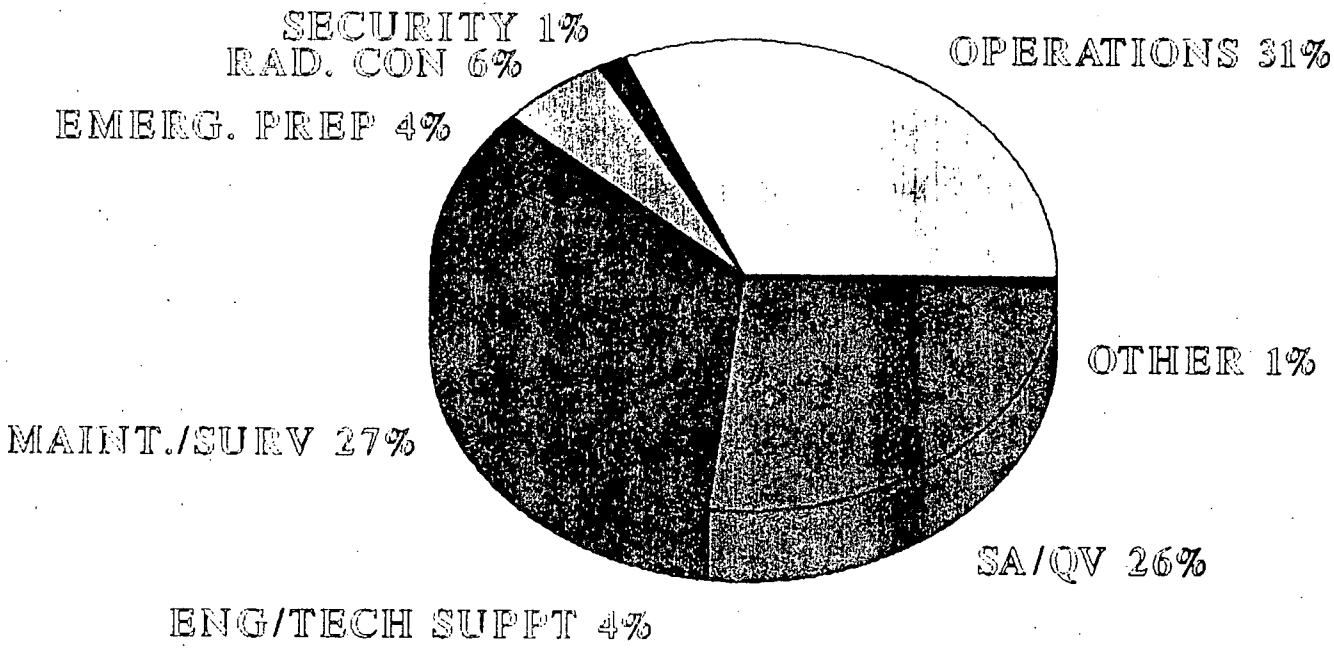
FUNCTIONAL AREA DISTRIBUTION

For Eighteen Region II Sites

SALP CYCLES 8 AND 9



MAN-HOURS/FUNCTIONAL AREA
ROBINSON-CYCLE 9



FACILITY PERFORMANCE SUMMARY

ROBINSON

FUNCTIONAL AREA	RATING LAST PERIOD	RATING THIS PERIOD
PLANT OPERATIONS (OPERATIONS & FIRE PROTECTION)	2	2
RADIOLOGICAL CONTROLS	1	1
MAINTENANCE/SURVEILLANCE	2	2
EMERGENCY PREPAREDNESS	2	2
SECURITY	1	1
ENGINEERING/TECHNICAL SUPPORT (ENGINEERING, TRAINING & OUTAGES)	2	2
SAFETY ASSESSMENT/ QUALITY VERIFICATION (QUALITY PROGRAMS & LICENSING)	2	2

OPERATIONS
(CATEGORY 2)

OVERALL PERFORMANCE IN THE AREA OF OPERATIONS REMAINED GOOD

STRENGTHS

- OPERATOR PERFORMANCE
- STAFFING
- MANAGEMENT INVOLVEMENT IN STARTUPS
- SHUTDOWN RISK MANAGEMENT

CHALLENGES

- MAINTAINING MANAGEMENT INVOLVEMENT
- LESSONS LEARNED
- CONTAINMENT HOUSEKEEPING

RADIOLOGICAL CONTROL
(CATEGORY 1)

OVERALL PERFORMANCE IN THIS AREA REMAINED EXCELLENT

STRENGTHS

- PEOPLE
  - MANAGEMENT
  - STAFF
- PROGRAMS
  - ALARA
  - TRAINING
  - PROCEDURES
  - AUDITS

RADIOLOGICAL CONTROL (CON'T)

(CATEGORY 1)

- PERFORMANCE
  - CONTAMINATED AREA
  - EFFLUENT CONTROL
  - PERSONNEL EXPOSURE
  - PRI & SEC CHEM CONTROL
  - CONFIRMATORY MEASUREMENT

CHALLENGE

- MAINTAINING PERFORMANCE

MAINTENANCE/ SURVEILLANCE

(CATEGORY 2)

OVERALL PERFORMANCE REMAINED GOOD

STRENGTHS

- PEOPLE
  - QUALIFIED AND CAPABLE
  - MAINTENANCE IMPROVEMENT PLAN
- PERFORMANCE
  - SAFETY SYSTEM AVAILABILITY
  - NO MAINTENANCE PERSONNEL INDUCED TRIPS
  - IGSCC IDENTIFICATION AND RESOLUTION

MAINTENANCE/ SURVEILLANCE (CON'T)

(CATEGORY 2)

CHALLENGES

- FACILITIES
- PROGRAMS
  - CHECK VALVES
  - POST MAINTENANCE TESTING
  - PROCEDURES
  - IST
- WORK CONTROL
  - FREON ISSUE
  - CAVITY SEAL
- PLANT AGING

EMERGENCY PREPAREDNESS

(CATEGORY 2)

PERFORMANCE IN THIS AREA REMAINED GOOD

STRENGTHS

- PERFORMANCE
  - CHALLENGING EXERCISE
  - EFFECTIVE MITIGATION
  - EFFECTIVE CRITIQUE
- AUGMENTATION/ACTIVATION
  - BEEPERS
  - DRILLS
- FACILITIES
- TRAINING

SECURITY
(CATEGORY 1)

PERFORMANCE IN THIS AREA REMAINED EXCELLENT

STRENGTHS

- PEOPLE
  - QUALIFIED AND CAPABLE
  - WELL MANAGED
  - EFFECTIVE OVERSIGHT OF CONTRACTORS
- PROGRAMS
  - EFFECTIVE AUDITS
  - SECURITY PLAN
  - COORDINATION AND COMMUNICATION

EMERGENCY PREPAREDNESS (CON'T)

(CATEGORY 2)

CHALLENGES

- CORRECTIVE ACTION EFFECTIVENESS
- EMERGENCY CLASSIFICATION

SECURITY
(CON'T)
(CATEGORY 1)

- PERFORMANCE
  - ACCESS CONTROL
  - BARRIER VERIFICATION
  - CONTROL OF SAFEGUARDS INFORMATION
  - SPENT FUEL SHIPMENT

- FACILITIES
  - SECURITY BADGE DETECTION
  - UPGRADE X-RAY EQUIPMENT
  - FIRING RANGE RENOVATION

CHALLENGE

- MAINTAINING PERFORMANCE

ENGINEERING/ TECHNICAL SUPPORT

(CATEGORY 2)

PERFORMANCE IN THIS AREA REMAINED GOOD

STRENGTHS

- SUPPORT TO OPERATIONS
  - MODIFICATIONS
  - EMERGENT ISSUES
- DESIGN BASIS DOCUMENTATION
- MANAGEMENT INVOLVEMENT
  - TECHNICAL SUPPORT IMPROVEMENT PLAN

ENGINEERING/ TECHNICAL SUPPORT (CON'T)

(CATEGORY 2)

- PERFORMANCE
  - MODIFICATIONS/UPGRADES
  - CONTROL ROD GUIDE TUBE PINS
  - SERVICE WATER SYSTEM
- TRAINING

CHALLENGES

- TECHNICAL SUPPORT
  - STAFFING
  - TRAINING
  - QUALIFICATION
  - BACKLOG MANAGEMENT

SAFETY ASSESSMENT/ QUALITY VERIFICATION (CATEGORY 2)

PERFORMANCE IN THIS AREA REMAINED GOOD

STRENGTHS

- MANAGEMENT INVOLVEMENT
  - MONITORING/ASSESSING
  - STARTUP MANAGERS
  - SHUTDOWN RISK MANAGEMENT
- OVERSIGHT
  - PLANT NUCLEAR SAFETY COMMITTEE
  - ONSITE NUCLEAR SAFETY
  - OPERATING EXPERIENCE FEEDBACK
- SAFETY EVALUATIONS

SAFETY ASSESSMENT/ QUALITY VERIFICATION (CON'T)

(CATEGORY 2)

CHALLENGES

- CORRECTIVE ACTION
  - SURVEILLANCE TEST PERFORMANCE
  - EMERGENCY RESPONSE AUGMENTATION
- RESPONSE TO INDUSTRY EVENTS
  - CHECK VALVE PROGRAM
  - TEMPORARY SERVICES IN CONTAINMENT
- EFFECTIVE NAD IMPLEMENTATION

ENCLOSURE 3

CP&L
Carolina Power & Light Company
ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

91 JUL 15 P2:37

JUL 0 9 1991

Robinson File No.: 13510E

Serial: RNPD/91-1596

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555:

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
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.

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

ENCLOSURE 4

Revision Sheet

Page	Line	Initial Report Reads	Final Report Reads
Coversheet	2	Initial SALP Report	Final SALP Report

ENCLOSURE

INITIAL SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

INSPECTION REPORT NUMBER

50-261/91-10

CAROLINA POWER AND LIGHT

H. B. ROBINSON

JANUARY 1, 1990 - MARCH 30, 1991

SEE REVISION SHEET

ENCLOSURE

FINAL SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

INSPECTION REPORT NUMBER

50-261/91-10

CAROLINA POWER AND LIGHT

H. B. ROBINSON

JANUARY 1, 1990 - MARCH 30, 1991