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 AUTH.NAME AUTHOR AFFILIATION
 DIETZ,C.R. Carolina Power & Light Co.
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SUBJECT: Responds to violations noted in Insp Rept 50-261/91-22 on 910920-1004. Corrective actions: EOP rewrite & upgrade in single-column format will be completed concurrent w/ abnormal operating procedures project by Mar 1993.

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO NRC INSPECTION REPORT NO. 50-261/91-22

Gentlemen:

The subject Inspection Report provided the results of a routine, announced inspection in the area of Emergency Operating Procedure (EOP) and Abnormal Operating Procedure (AOP) followup which was conducted at Carolina Power and Light Company's (CP&L) H. B. Robinson, Unit No. 2 (HBR2), during September 30 through October 4, 1991. This Inspection identified no specific violations or deviations. However, as discussed within paragraph 3 of the Inspection Report, the limited resources allocated to the EOP and AOP Upgrade Projects have been insufficient to accomplish these tasks within the expected time frame. In response to this concern, a review of resource allocation has been performed, together with a re-evaluation of the overall project methodology and completion schedule. This submittal provides the results of this review and re-evaluation, and satisfies the commitment to supply this information prior to the end of December, 1991.

Original commitments associated with EOP and AOP programs and procedures were made within CP&L's response to NRC Inspection Report No. 50-261/89-16, dated December 8, 1989. Numerous and extensive upgrades to programmatic and administrative documents were to be performed, which in turn were to be factored into the overall upgrade of the EOPs and AOPs. Appropriate changes to the EOPs and AOPs were to be implemented by December 20, 1991.

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As discussed within Inspection Report No. 50-261/91-22, significant progress has been made in the development and upgrade of programmatic and administrative documents associated with both the EOPs and AOPs. This includes the development of the upgraded Plant Specific Technical Guideline (PSTG), the development of an AOP Writer's Guide, the upgrade of both the EOP Writer's Guide and the Verification and Validation (V&V) procedure, and the establishing of programs to address nomenclature, human factors, and technical comments identified within the EOPs and AOPs. These activities represent a significant investment in both time and resources, and provide a documented and well-defined framework for the development of upgrades to the EOPs and AOPs.

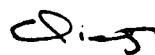
As stated above, a re-evaluation of the overall methodology and completion schedule has been completed with regard to the upgrade of the EOPs and AOPs. A number of enhancements have been identified which will focus and streamline the development, review, and approval of these procedures. These enhancements include the development of a detailed schedule to measure and track the development of the upgraded EOPs. For each subset of EOPs, this schedule provides the start and end dates for specific activities such as development, review, comment resolution, rewrite/incorporation of comments, verification, validation, a second comment resolution period, and final approval. Further, a well-defined, multi-disciplinary review team is planned which will provide a focused, consistent review of the upgraded EOPs. Also, dedicated plant-specific simulator time is to be established to support the V&V of the upgraded EOPs. These enhancements represent additional management oversight and controls which will support completion of the EOP Upgrade Project in March, 1993, without the specific application of additional resources to the project. It should also be noted that the Westinghouse Owners Group (WOG) expects to issue Revision 1B to the Emergency Response Guidelines (ERG) in March, 1992. This information will be factored into the PSTG and the EOP upgrades within the proposed completion schedule. This represents additional scope of work beyond the upgrade items already identified.

With respect to the Abnormal Operating Procedures, the rewrite and upgrade of the AOPs in the single-column format will be completed concurrently with the EOP Upgrade. This will result in the AOP Upgrade Project being completed in March, 1993.

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The information provided above, including the revised completion dates, represents the most recent scheduling information available with regard to the upgrade of the EOPs and AOPs. Should you have any further questions regarding this matter, please 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
Mr. L. W. Garner
INPO