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SUBJECT: Suppl response to violations noted in insp rept 50-261/91-22
 on 910930-1004. Corrective actions: licensee plans to complete
 training on revised & upgraded EOPs & AOPs during upcoming
 wks of Licensed Operator Requalification Training.

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Carolina Power & Light Company

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MAR 3 1 1993

Robinson File No.: 13510E

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United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
SUPPLEMENTAL 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 H. B. Robinson Plant, Unit No. 2, during September 30 through October 4, 1991. This inspection identified no specific violations or deviations; however, as discussed within paragraph 3 of the report, the limited resources allocated to the EOP and AOP Upgrade Projects had been insufficient to accomplish these tasks within the expected time frame.

In response to this concern, a review of resource allocations was performed, together with a re-evaluation of the overall project methodology and completion schedule. The results of this review and re-evaluation were provided to the NRC by letter dated December 23, 1991. In summary, this letter identified additional management oversight and controls which would support the completion of the EOP Upgrade Project in March, 1993. In addition, the rewrite and upgrade of AOPs in single-column format was to be completed concurrently with the EOP Upgrade Project, such that the AOP revisions would also be completed in March, 1993.

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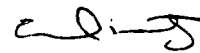
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Since our December, 1991, submittal, significant effort has been devoted to the rewrite, review, verification and validation of both the EOPs and AOPs. These efforts will result in the approval of upgraded EOPs and AOPs by the previously identified completion date of March, 1993. However, in order to support the controlled and prudent implementation of these revised procedures, adequate attention must be given to the training of Operations personnel. On this basis, we currently plan to complete training on the revised and upgraded EOPs and AOPs during upcoming weeks of Licensed Operator Requalification Training. Utilizing the current 1993 retraining schedule, this will result in implementation of the revised procedures by May 31, 1993.

This represents the most recent scheduling information available with regard to the completion, approval, and implementation of the revised and upgraded EOPs and AOPs.

Should you have any questions regarding this matter, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,



Charles R. Dietz
Vice President
Robinson Nuclear Plant

CTB:lst

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO