

NOV 1 1993

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

Carolina Power and Light Company  
ATTN: Mr. C. R. Dietz  
Vice President  
Robinson Nuclear Plant  
P. O. Box 790  
Hartsville, SC 29551

Gentlemen:

SUBJECT: CHANGES IN QUALITY ASSURANCE PROGRAM

We have reviewed your letter dated July 28, 1993, (Serial No. RNP/93-1772) which requested a change in your Quality Assurance (QA) program regarding the biennial review of procedures. This change is considered a reduction in your QA program commitments and requires NRC approval prior to implementation. As discussed below, your request as currently proposed is deficient in meeting the NRC guidance provided on December 21, 1992, from Mr. Charles Rossi to the Directors of the Division of Reactor Safety in each NRC Regional Office.

You indicated in your request that non-routine procedures are reviewed when they are used in the licensed operator training program and during emergency drills and exercises. Non-routine procedures include emergency operating procedures (EOPs), abnormal operating procedures (AOPs), procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event. These procedures must be maintained accurate and be available at all times. The use of some non-routine procedures in the licensed operator training program and during emergency drills provides additional opportunities to review and verify the accuracy and adequacy of these procedures. However, reviews performed when using these procedures during the above activities are not considered a substitute for the formal two year review. Non-routine procedures should continue to be formally reviewed at least every two years and revised as appropriate.

Your request also states that infrequently used procedures that have a potential to cause a plant transient are reviewed prior to use to determine their adequacy. Infrequently used procedures are those routine plant procedures that have not been used for two years or more. Your review should not be limited to only those infrequently used procedures that could cause a plant transient. There are other infrequently used procedures that are important to plant safety or personnel safety. Any routine plant procedure that has not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

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In addition to our concerns with your proposed review of non-routine and infrequently used procedures, the assessment effort by the Nuclear Assessment Department discussed in your July 28, 1993, letter is not considered to be adequate to verify the effectiveness of the procedure review and revision program. At least every two years, the Nuclear Assessment Department should audit or perform an assessment of a representative sample of the routine plant procedures that are used more frequently than every two years. The audit (or assessment) is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively.

We request that you provide additional information for the change in your QA Program Description to address the items discussed above or propose equivalent alternatives. This request was discussed with Mr. D. Waters of your staff by phone on October 27, 1993.

If you have any questions, please contact Mr. C. Julian at 404-331-5585.

Sincerely,

Original signed by  
Albert F. Gibson

Albert F. Gibson, Director  
Division of Reactor Safety

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