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SUBJECT: Suppls 890315 response to violation noted in insp rept  
 50-261/89-02. Corrective actions: administrative program  
 implemented, providing formal methodology for developing,  
 revising & validating maint procedures.

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Carolina Power & Light Company

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MAY 14 1992

Robinson File No.: 13510E

Serial: RNP/93-1127

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  
NRC INSPECTION REPORT NO. 50-261/89-02 SUPPLEMENTAL RESPONSE

Gentlemen:

NRC Inspection Report 50-261/89-02 identified a Severity Level IV Violation (89-02-01), in that Corrective Maintenance procedures did not adequately prescribe activities affecting quality. In the March 15, 1989, response to that violation, Carolina Power and Light Company (CP&L) committed to a Maintenance Procedure Upgrade Program to ensure adequate technical content was provided in procedures. On May 4, 1989, CP&L provided to the NRC a scope, plan and schedule for the Maintenance Procedure Upgrade Program which, at that time, included a total of 511 Maintenance Procedures, and the expected completion schedule of December 31, 1990. Since the original commitment, seventy-five (75) procedures were added to the project scope to accommodate newly developed procedure formatting criteria, and on September 17, 1990, CP&L notified the NRC of a revision to the initial schedule, establishing a new completion date of December 31, 1992. The scope was again impacted by the addition of thirty (30) new procedures that were required to support Refueling Outage 14 activities in 1992. On September 24, 1992, CP&L again notified the NRC of a revised completion date of June 30, 1993.

To date, a total of 543 Maintenance Procedures have been upgraded and approved. The remaining procedures have been converted to the upgraded format and are currently in the review and approval process. In addition, 150 new procedures have been identified from Technical Support system reviews which, when implemented, will supplement the current Preventative Maintenance Program.

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Letter to United States Nuclear Regulatory Commission

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An administrative program has been implemented which provides a formal methodology for developing, revising, and validating Maintenance Procedures. Additionally, this program provides a mechanism for tracking the quality of procedures that have been upgraded by trending the types of revision requests received by the Maintenance Procedures Group.

The actions taken in response to NRC Violation 89-02-01 have been substantial in elevating the quality and technical content of Maintenance Procedures. Specific resources have been permanently committed to the Maintenance Procedures Program, and methods have been established to assure technical adequacy and uniformity of procedure format and content. Current and future procedures that are revised or developed will be in accordance with these programs and methods such that a high level of quality and content will be continuously achieved. As such, CP&L considers the original 1989 commitment to upgrading the technical adequacy of Maintenance Procedures to now be complete.

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

Very truly yours,



Charles R. Dietz  
Vice President  
Robinson Nuclear Plant

RDC:lst

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