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Robinson File No.: 13510E

Serial: RNP-RA/95-0105

JUN 22 1995

United States Nuclear Regulatory Commission

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

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SUPPLEMENTAL REPLY TO LETTER TRANSMITTING NRC INSPECTION REPORT
NO. 50-261/95-08

Gentlemen:

NRC Inspection Report 95-08, dated April 7, 1995, documented NRC review of committed corrective actions taken as described in Licensee Event Report (LER) 93-017, "Degraded Condition due to Non-Safety Fuses Installed in Engineered Safety Feature Application." As a result of reviewing Procurement Engineering procedures during this inspection, the NRC inspectors raised a concern regarding implementation of the new Procurement Engineering procedures. As requested in the NRC letter transmitting Inspection Report 95-08, we addressed this concern in our reply of May 7, 1995, and indicated that a self-assessment of site specific commitments related to procurement activities had determined that no previous commitments were found to have been inadvertently negated. During a telephone conversation on May 18, 1995, between Mr. Shymlock of the NRC Region II, and Mr. Garrou of our staff, we agreed to provide this revised letter to specifically address our commitments regarding system engineering reviews of downgrades of safety-related component classifications.

LER 93-017 reported a degraded condition due to the installation of a non-safety related fuse installed in the "B" Instrument Inverter, which is a safety-related application. The safety-related classification for this fuse had been inappropriately downgraded during the procurement process. LER 93-017 stated, as a corrective action for this occurrence, that Nuclear Engineering Department (NED) Procurement Engineering (PE) procedures would be revised to "require System Engineer reviews of downgrading." This commitment was implemented by Revision 5 of procedure Procurement Engineering (PE)-010, "Parts Functional Classification."

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On July 1, 1994, the functions of the NED Procurement Engineering and Quality Control Receipt Inspection organizations were consolidated under the Materials and Contract Unit, directed by the corporate Nuclear Procurement, Contracts, and Materials Management (NPCMM) Section. An interface agreement between the Vice President - Nuclear Engineering Department and the Manager - NPCMM for transition of the Procurement and Design Engineering and the materials acquisition processes, from the NED to the NPCMM Section, was published on June 30, 1994, and the interface agreement was distributed to the Vice Presidents of each of the Carolina Power & Light (CP&L) Company nuclear sites. This document authorized engineers in the reorganized Procurement Engineering organization to perform the procurement related activities previously assigned to NED, including those performed by System Engineers. Specifically, this interface agreement states, "Certain design related activities such as procurement specification revisions, specification waivers, engineering evaluations, etc. may be performed by procurement engineers utilizing NED/Plant Operating Manual (POM) procedures for these activities. The nature of these activities will vary as NED processes are modified in transition to the sites."

At the time of the NRC inspection, procedure PE-010, Revision 6 was in effect to require component level safety-related component classifications to be performed by the System Engineer. However, a new corporate procedure, Material Control Section (MCS)-1, "Material Acquisition," was approved for use concurrent with PE-010 which did not include the site specific commitment for the System Engineer to review downgrading of safety related component classifications. The individuals that performed the 10 CFR 50.59 review for procedure MCS-1 were cognizant of the commitment made in LER 93-017; however, they did not specifically document this commitment in their review of the new procedure. Subsequent to the inspection, plant procedure MOD-024, "Component Functional Classification," has been approved, and procedure PE-010 has been deleted. The 10 CFR 50.59 review that was performed for procedure MOD-024 identifies the specific commitment from LER 93-017, and provides the justification for the change described below.

NPCMM Section Procurement Engineers now perform safety-related classifications of piece-parts in accordance with procedure MCS-1, and component level safety-related classifications are performed by the NED Design Engineering Unit in accordance with procedure MOD-024. NPCMM Section Personnel performing engineering functions associated with material acquisition and material management are qualified to perform these functions. Therefore, we consider that the level of assurance established by our commitment to "require System Engineer reviews of downgrading" has been maintained.

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Should you have any questions regarding this matter, please contact Mr. A. L. Garrou at (803) 857-1544.

Very truly yours,



R. M. Krich
Manager - Regulatory Affairs

c: Mr. S. D. Ebner, Regional Administrator, USNRC, Region II
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