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SUBJECT: Clarifies remarks on 890111 meeting summary on design basis documentation program.

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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DESIGN BASIS DOCUMENTATION PROGRAM

REFERENCE: NRC Letter dated February 9, 1989 providing summary of January 11, 1989 meeting on the Design Basis Documentation Program

Gentlemen:

The subject letter provides a summary of the Design Basis Documentation (DBD) presentation that Carolina Power & Light Company (CP&L) made to the NRC on January 11, 1989. We appreciate the opportunity to communicate on our DBD process, and in a continuing positive tone we offer some clarifying remarks on your meeting summary.

While the Safety System Functional Inspection (SSFI) of 1987 did identify specific issues, it was for broader reasons than SSFI that CP&L entered into the DBD program. These reasons include compilation and consolidation of documentation to facilitate design changes, procedural changes, etc., and placing the plant in a positive posture with respect to possible plant life extension activities.

With respect to the field validation process, we need to clarify that the primary purpose of validation is to validate the DBD itself, not the physical field condition. This will assure that we have a substantially correct document. Discrepancies will, of course, be resolved to ensure proper design intent.

As we expressed in the January 11 presentation, CP&L is encouraged to find that the enforcement staff's interpretation of the use of the expanded discretionary provisions of 10CFR2, Appendix C, Section G is consistent with CP&L's.

Carolina Power & Light Company is also encouraged by the feedback received during our recent Corporate Office visit from members of the NRC team preparing the proposed Guidance Document for utility generated Design Basis Documentation Programs. Aside from the direct positive feedback on the scope and direction of our program, it was apparent that the NRC is sensitive to the scope of this effort and the magnitude of utility resource allocation necessary for such an undertaking.

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PDR ADOCK 05000261
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Again, we appreciate the opportunity we had to review our extensive DBD program with your staff. If you have any further questions or comments, please contact me or my staff.

Yours very truly,



L. I. Loflin
Manager

Nuclear Licensing Section

RWP/crs (286CRS)

cc: Mr. S. D. Ebnetter
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