

NOV 5 1981

Docket No. 50-261



Mr. J. A. Jones  
Senior Vice President  
Carolina Power and Light Company  
336 Fayetteville Street  
Raleigh, North Carolina 27602

Dear Mr. Jones:

SUBJECT: TMI ACTION PLAN ITEMS 1.A.1.3, 1.C.5 and 1.C.6 AS DESCRIBED  
IN NUREG-0737

We have completed our review of your submittals for implementing the referenced TMI Action Plan items for Robinson Unit 2. Our conclusions on each item are as follows:

Item No. 1.A.1.3.1 Shift Manning-Limit Overtime

The licensee's submittals of November 5 and December 16, 1980 and February 26, 1981 relative to limiting overtime have been reviewed and note taken of the areas where CP&L policy and practice is not in full agreement with the positions stated in NUREG-0737. Our Office of Inspection and Enforcement has reviewed Administrative Instruction, Section 4, on the use of overtime as well as the procedures in use at Robinson Unit 2. On the basis of these reviews we find the policy for limiting overtime at Robinson Unit 2 to be in sufficient agreement with the intent of the requirements of Section 1.A.1.3.1 to be acceptable.

Item No. 1.C.5 Procedure for Feedback of Operating Experience to Plant Staff

By letter dated June 11, 1980 the licensee committed to meet the requirements and the implementation date for this Task Action Item. To accomplish the objectives of this program both an onsite and offsite organization is used. Further reorganization and the development of new procedures and policies are being performed. A training instruction has been established to implement the required onsite program in conjunction with established procedures. A periodic audit is included in the Corporate Quality Assurance Performance Evaluation Unit Schedule.

On the basis of our review of this program, we find the procedures for feedback of operating experience to be acceptable.

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Item 1.C.6 Guidance on Procedures for Verifying Correct Performance of Operating Activities

By letter dated December 31, 1980, the licensee transmitted commitments and comments regarding the requirement for verifying correct performance of operating activities. We have reviewed the licensee's administrative and surveillance procedures, including recent revisions of operating procedures requiring a second independent licensed operator or qualified auxiliary operator to make the necessary verifications. These procedures coupled with clearance and test procedures adequately control the normal operating functions and maintenance activities. Based on the results of our review these actions are acceptable.

We consider TMI Action Plan Items Nos. 1.A.1.3.1, 1.C.5 and 1.C.6 resolved.

Sincerely,

Original Signed By:

Steven A. Varga, Chief  
Operating Reactors Branch #1  
Division of Licensing

cc: See next page

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Mr. J. A. Jones  
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