

CP&L

Carolins Power & Light Company

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H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

August 27, 1982

Robinson File No: 13510E

Serial: RSEP/82-1492

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 82-20

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) provides this information which is in addition to our original response to IE Inspection Report 82-20 dated August 20, 1982. This ensures that the additional information requested in the Report's transmittal letter is fully addressed.

IE Inspection Report 82-20 transmittal letter contained the following:

One violation listed in Appendix A was recurrent and uncorrected at the time of the inspection. Therefore, in addition to the need for corrective action regarding this specific violation, we are concerned about the implementation of your management control systems that permitted this recurrence. Consequently, in your reply, you should describe in particular those actions taken or planned to improve the effectiveness of your management control systems.

Further, we request you provide in your response a date and the method by which you will change your training instructions to reflect NRC policy on grading criteria for requalification programs.

The 1981 drawing violation IER-81-12-04 was the result of the plant staff not complying with the drawing control procedures. CP&L's response concluded that although the drawing control procedures were adequate, they were not

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fully understood by plant personnel responsible for implementing the drawing control program. The specific problems identified were corrected and a re-review of the established procedures by those responsible for implementing them was thought to be adequate to ensure that the violation did not recur. Therefore, there were no changes in the management control system following the 1981 drawing violation.

CP&L's followup investigation of the drawing control problems identified in the 1982 IE Inspection Report Item IER-82-20-02 indicates that programmatic deficiencies exist in the drawing control program. These deficiencies were based on a lack of cohesion between the various subunits responsible for identifying a drawing problem, making the drawing change, ensuring the change is reflected in the plant procedures, and distributing the new drawings and procedures.

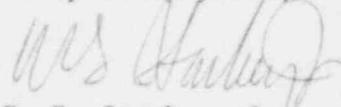
Correcting these programmatic problems requires a high degree of management attention and supervision. Therefore, additional drafting expertise is now on site supervising the drafting update effort. The Engineering Supervisor is working in conjunction with Plant Document Control personnel to ensure that established procedures are compatible between the various subunits and to investigate methods by which the drawing control program can be consolidated to ensure that drawings accurately reflect the as-built condition of the plant.

The Plant Nuclear Safety Committee will follow and evaluate these corrective actions to ensure that they result in a drawing program that actively interacts with all aspects of plant operation, maintenance, and construction. The result of this followup action and evaluation will be available by October 1, 1982. Management control and recommendations developed will be fully evaluated by management and implemented as rapidly as possible consistent with attaining the quality desired.

With respect to the grading criteria for requalification programs, IE Inspection Report 82-24 by Mr. G. A. Belisle describes CP&L's commitment to revise plant procedures to reflect the current NRC grading criteria by October 1, 1982.

If you have any questions concerning this information, please contact me.

Very truly yours,



R. B. Starkey, Jr.
General Manager

H. E. Robinson SEG Plant

CLW/bs

cc: R. C. DeYoung (1)