



Carolina Power & Light Company

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December 31, 1982

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 3100
Atlanta, GA 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO INSPECTION REPORT IER-82-33

Dear Mr. O'Reilly:

Carolina Power & Light Company (CP&L) provides this information which is in addition to our original response to IE Inspection Report 82-33. This insures that the additional information requested in the Report's transmittal letter and the clarifying information requested in your letter dated December 15, 1982, is appropriately addressed.

LER 82-33 Transmittal Letter Request

IE Inspection Report 82-33 transmittal letter contained the following:

"In addition to the need for corrective action regarding these specific violations, we are concerned about the implementation of your Quality Assurance Program that permitted their occurrence. Consequently, in your reply, you should describe, in particular, those actions taken or planned to improve the effectiveness of your Quality Assurance Program."

As part of an overall effort to improve the effectiveness of the Quality Assurance Program, several actions have been underway. Although not specifically initiated as a result of the findings in this report, it is believed that these will substantially enhance the program and help to prevent recurrence of these types of violations.

1. A videotape on quality performance has been developed and is currently used in General Employee Training for personnel involved in nuclear plant activities.

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2. Two additional positions, an additional QA Surveillance Specialist, and a QA Engineer have been authorized for the H. B. Robinson Operations Quality Assurance/Quality Control (OQA/QC) organization.
3. New OQA/QC surveillance procedures have been developed to specifically cover areas such as ISI, Appendix J Testing, Technical Specifications, and other regulatory requirements.
4. All Technical Specification revisions and other incoming regulatory requirements will be monitored by OQA/QC for inclusion and implementation by the Plant.
5. A trending procedure will be implemented in 1983 to evaluate the effectiveness of the overall Quality Assurance Program.
6. One additional Project QA Specialist and two Senior QA Specialist have been authorized for the Performance Evaluation Unit (PEU).
7. Verification that Items 4 and 5 above are being implemented has been included in the PEU Audit Program.

Severity Level V Violation LER 82-33-S15 - Additional Information

Enclosure "A" is Carolina Power & Light's denial response to this violation. The denial was based on the fact that although the Emergency Instructions (EI's) in question did not have specifically categorized sections, in accordance with ANSI N18-7, 1976, paragraph 5.3.9.1, they did include the required information under different section titles. The denial cited EI-17 as an example. The section titled "Manual Action" discussed items that would have been categorized under either "Immediate Operator Actions" or "Subsequent Operator Actions" had these titles been used in EI-17.

Therefore, again we submit this problem was properly classified as a Concern and not a Nonconformance. Discussions on EI-15 and EI-18 were not included in the denial because the EI-17 was thought to be adequate and indicative of CP&L's position on the proposed violation. However, the following information is provided on EI-15 and EI-18 to ensure that this matter is clearly addressed.

Concern on EI-15

EI-15 does not specifically contain a section titled "Symptoms".

Response

EI-15 is entitled "Control Room Inaccessibility". The section titled "Discussion" includes the information that would have been included under "Symptoms" had this title been used in EI-15.

Concern on EI-18

EI-18 does not specifically contain sections titled "Symptoms" and "Automatic Actions".

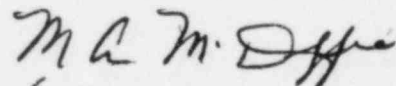
Response

EI-18 is entitled "Loss of Emergency Busses (480 V) and/or Station DC Batteries" - This instruction is used to activate the Dedicated Shutdown System as a result of a fire. The sections titled "Discussion", "Alarm", and "Operator Actions" include the items that would have been included under "Symptoms" and "Automatic Actions" had these titles been used in EI-18.

A program has been developed as a result of NUREG-0737, Item I.C.1, that will completely revise and reformat the EI's by the end of the next refueling outage. This program should resolve the present concerns on the format of EI's.

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

Yours very truly,


for E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

EEU/kjr (5959C10T4)
Enclosure

cc: Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)