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

SEP 1 1983

Robinson File No: 13510E

Serial: RSEP/83-1146

A 9

2

-

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

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23
I.E. INSPECTION REPORT NO. 82-20

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) submits a change in the response to the subject Inspection Report dated August 20, 1982.

In response to Violation A of the subject Inspection Report, CP&L described a two-phase Drawing Update Program. Phase one involved the as-built walkdowns of systems which were identified as "important to safety." These walkdowns were completed in July, 1982. The second phase incorporated these as-built walkdowns into permanent Plant drawings and involved walkdowns of the remaining systems (determined not to be "important to safety") by September 1, 1983. The changes identified as a result of the phase one walkdowns have been incorporated into the permanent Plant drawings. Additionally, a number of the systems included in phase two have been walked down (e.g., all systems inside containment). However, to assure consistency of Plant drawings, once phase two was well underway, a program to walk down the phase one Plant systems was started in January, 1983. This greatly expanded the scope of the Drawing Update Program but was considered necessary to achieve quality results.

The Drawing Update Program, which in its final form really started in January, 1983, is close to its revised schedule and is expected to be back on schedule by the end of the year. The NRC Senior Resident Inspector has been kept abreast of the progress of this Drawing Update Program. Due to the expanded scope of this Drawing Update Program, therefore, not all system walkdowns have been completed. In addition, the response to Violation B of the subject response stated that the corresponding procedure changes for these other as-built walkdowns would also be completed by September 1, 1983.

Letter to Mr. James P. O'Reilly Serial: RSEP/83-1146

Page 2

Because the walkdowns are not completed, the corresponding procedures are not yet completed.

We believe that the Drawing Update Program, as it is being implemented today under a revised schedule, will result in accurate drawings which will assist in the safe operation of the Plant.

Because of the additional effort required, the response commitments to Violations A and B of the subject Inspection Report should be revised to read: "The flow diagrams and corresponding procedures for Q-list portions of systems will be completed by December 31, 1983. Changes to other procedures will be completed in accordance with the Long Term Improvement Program."

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

Very truly yours,

R. B. Starkey, fr. General Manager

H. B. Robinson SEG Plant

CLW: FMG: JMC/bss

cc: R. C. DeYoung (1)