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SUBJECT: Responds to Generic Ltr 90-03 re relaxation of NRC position
 in GL 83-28,Item 2.2,Part 2 on vendor interface.

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 TITLE: Generic Ltr 90-03, Relaxation of Staff Position in GL-83-28, Item 2.2

NOTES:Application for permit renewal filed. 05000400

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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63

GENERIC LETTER 90-03 RESPONSE

Gentlemen:

On March 20, 1990 the NRC issued Generic Letter 90-03, Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2 'Vendor Interface for Safety-Related Components'. Carolina Power & Light herein provides the response to the subject Generic Letter for the above listed facilities.

Generic Letter (GL) 90-03 provides clarification of the Staff's position on GL 83-28 Item 2.2.2 "Vendor Interface for Safety-Related Components". GL 83-28 required Licensees to establish and maintain a vendor interface program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of the plant.

In the response to GL 83-28, the industry generally took the position that the Vendor Equipment Technical Information Program (VETIP) described in the March 1984 Nuclear Utility Task Action Committee Report, INPO 84-010, meets the intent of Generic Letter 83-28, Item 2.2 Part 2. The VETIP program includes the Nuclear Plant Reliability Data System and the Significant Event Evaluation and Information Network, both managed by INPO.

Generic Letter 90-03 modified the previous NRC position that Licensees must contact ALL safety-related component vendors, by now only requiring interface with KEY safety-related component vendors.

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The Generic Letter required Licensees to evaluate their vendor interface programs and confirm that the programs include:

- (a) A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. In addition, this program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSS vendor; and
- (b) A program of periodic contact with the vendors of other key safety-related components not included in (a) above.

The vendor interface program should also take into account the requirements of 10 CFR 50, Appendix B which requires the Licensee or applicant to be responsible for establishing and executing the quality assurance program. It states that the licensee or applicant may delegate to others the work of establishing and executing the quality assurance program or any part of it, but the licensee or applicant shall retain responsibility for the program. Therefore the licensee or applicant should have a program which assures that procedures and instructions are properly prepared and implemented and that quality assurance programs for design, maintenance or modification work performed on safety-related equipment by outside vendors or contractors are properly implemented. These programs should clearly establish and delineate in writing the authority and duties of persons and organizations performing activities affecting this safety-related equipment.

If the programs do not already include both elements described in above then the Licensees should submit a schedule for implementation of the remaining items or provide a justification for their position.

Carolina Power & Light Company has reviewed the Generic Letter and the plant vendor contact programs and determined that the Shearon Harris and H. B. Robinson Plant programs include both the elements called out in the Generic Letter for NSSS and other key safety-related equipment. The Brunswick Plant Vendor Technical Information Program includes portions of element (a). BSEP periodically contacts vendors as part of engineering and purchasing activities but does not as yet have a program including all aspects of both elements. The BSEP program will be amended to include those elements which are not included presently. The program enhancements at BSEP will be implemented by December 31, 1992.

Please refer any questions regarding this submittal to Mr. Steven Chaplin at (919) 546-6623.

Yours very truly,



A. B. Cutter
Vice President
Director - Special Nuclear Projects

ABC/SDC

cc: Mr. R. A. Becker
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Mr. R. Lo
Mr. R. L. Prevatte (NRC - BNP)
Mr. J. E. Tedrow (NRC - HNP)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

My commission expires:

6/29/92

