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 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
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 CUTTER,A.B. Carolina Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 GRACE,J.N. Region 2, Ofc of the Director

SUBJECT: Forwards design basis reconstitution project description & schedule.

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SERIAL: NLS-88-094

Dr. J. Nelson Grace, Regional Administrator  
United States Nuclear Regulatory Commission  
101 Marietta Street, NW  
Atlanta, GA 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
PLAN AND SCHEDULE FOR DESIGN BASIS RECONSTITUTION

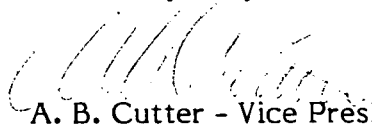
Dear Dr. Grace:

Your letter dated January 19, 1988 requested that Carolina Power and Light Company submit a description of planned activities and a schedule for implementation of activities as related to efforts to reconstitute the design basis for safety-related systems at H. B. Robinson Steam Electric Plant, Unit 2.

Our plans and schedule for this effort were presented during a meeting at your office on April 5, 1988; a summary of the description and schedule for this project is attached.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 836-7318.

Yours very truly,

  
A. B. Cutter - Vice President  
Nuclear Engineering Department

ABC/JSK/mss (5407JSK)

Attachment

cc: Document Control Desk  
Mr. R. Lo  
Mr. L. Garner (NRC - HBR)

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H. B. ROBINSON NUCLEAR PLANT - UNIT 2  
DESIGN BASIS RECONSTITUTION PROJECT  
DESCRIPTION AND SCHEDULE

I. PURPOSE

The purpose of the H. B. Robinson Nuclear Plant Design Basis Reconstitution Project is to structure the current design bases and calculations/analyses of record, applicable to the plant systems, and control them for future use.

II. SCOPE

The project will research and acquire available safety system design basis and descriptive information and integrate it into a set of system design basis documents (DBDs) in a common format. The system DBD format developed by Carolina Power & Light (CP&L) for the Shearon Harris Nuclear Power Plant (SHNPP) will be used as a basis for the H. B. Robinson Plant; the DBDs prepared for SHNPP in this format have been successfully applied in CP&L design work. A pilot program approach will be utilized to complete three system DBDs in 1988. In addition, substantial effort is being expended in 1988 on two major electrical DBDs scheduled for completion in 1989. Preparing DBDs for the pilot program systems selected will involve different primary engineering disciplines and degrees of outside engineering assistance. The lessons learned will allow a realistic post-pilot program assessment of the project's methodology, estimated cost, and forecast schedule before proceeding with the preparation of the remainder of the system DBDs in the 1989-1991 time frame. Carolina Power & Light Company plans to use internal resources to the maximum extent practicable on this project to retain the experience gained.

Subsequent to the approval of each system DBD for preliminary use, an inspection will be performed to check plant procedural consistency with the DBD and field validate the system's critical design parameters as they relate to the system hardware and its performance and configuration. The inspection will utilize SSFI or equivalent methodology. The results of the inspection will be used in a feedback loop to further enhance the accuracy of the system DBD and to initiate appropriate changes to plant procedures and/or system hardware.

III. PLANNED ACTIVITY

Carolina Power & Light has committed approximately \$1,500,000 in 1988 to enhance the H. B. Robinson Nuclear Plant's document control system and start the project. A full-time Project Manager has been assigned to plan, organize and control the overall project and direct the 1988 pilot program. Specific tasks to be performed in 1988 include:

1. Establish the project functional organization (complete).
2. Prepare a formal project interface document between Robinson Nuclear Project and the Nuclear Engineering Department (NED) (complete).
3. Prepare a project guideline to properly sequence the data acquisition and the drafting and formatting of the DBDs (complete).

4. Establish contracts with Westinghouse and Ebasco for engineering support (complete).
5. Search Westinghouse, Ebasco, and CP&L archives for design basis and system descriptive information (in progress).
6. Complete the pilot program, i.e., NED approves the complete system DBDs on the Auxiliary Feedwater, Safety Injection, and Reactor Safeguard and Protection Systems for preliminary use.
7. Make significant progress on the Electrical Power Distribution System and Electrical Cable/Raceway DBDs started in 1987.

#### IV. SCHEDULE AND GENERAL METHODOLOGY

The proposed project schedule is shown on Attachment A. Within it are the subschedules for preparing the individual system DBDs and the subsequent procedure and hardware inspections. Although the subschedules vary in length, due to resource availability and system complexity, the general steps in preparing the system DBDs are common to all. These steps are as follows:

1. Acquire the original system design basis, i.e., system regulatory and functional requirements and codes/standards of record; except where it has been clearly superceded by significant, well-documented, post-operating license (OL) design basis commitments, e. g., IE Bulletin 79-14.
2. Integrate post-operating license regulatory commitments.
3. Document the current system design basis, i.e., 1 above as modified by 2 above.
4. Document and/or acquire the original system calculations/analyses of record; except where they have been clearly superceded by post-OL system calculations/analyses of record, e.g., the calculations/analyses supporting the change from Westinghouse to Exxon fuel.
5. Review post-OL system modifications, noting changes that may have affected 4 above.
6. Identify the current system calculations/analyses of record, i.e., 4 above as modified by 5 above.
7. Identify and catalog current system descriptive information; e. g., specifications, drawings, vendor information.
8. Integrate the information in 3, 6, and 7 above into a draft system DBD. Information in 6 and 7 above will be incorporated in the draft system DBD via reference. Information in 6 above will also be incorporated into the plant calculation index.
9. Perform interdisciplinary design verification of the draft system DBD.

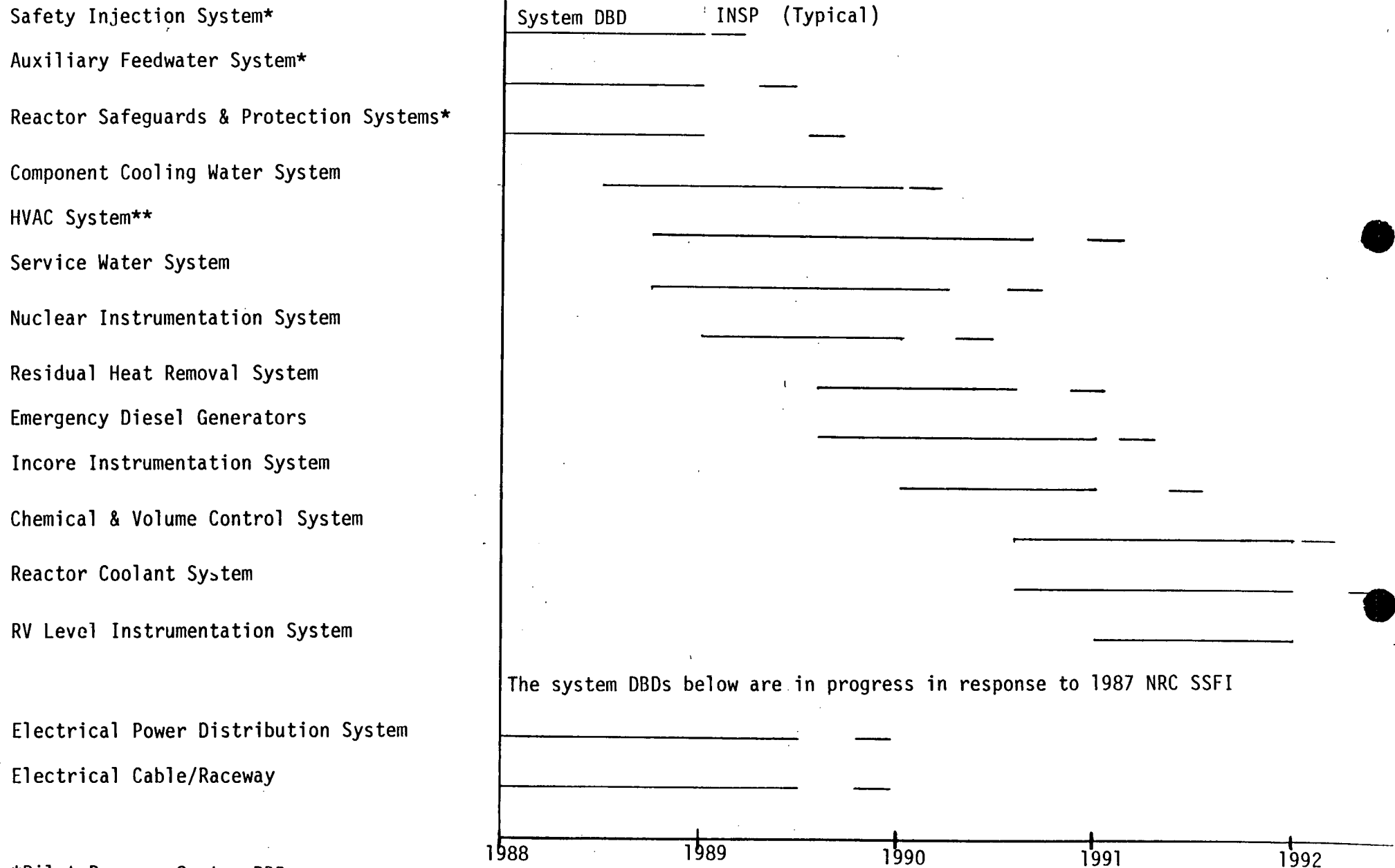
10. Approve the design verified system DBD, and issue it as a controlled document on a preliminary use basis.
11. Transmit hard copies of all approved system DBD references to plant document control.
12. Perform a procedure and hardware inspection on the subject system using the approved system DBD and its references as the inspection's standard.
13. Revise the system DBD to incorporate improvements identified by the procedure and hardware inspection and reissue it for use.

The proposed schedule, shown in Attachment A, is the current best estimate of the time required to prepare DBDs for the listed systems. It is anticipated that this schedule will require revision as experience is gained via the 1988 pilot program. It should also be noted that the schedule does not reflect the integration of the procedure and hardware inspections' results back into the process, since the extent of these efforts cannot be known at this time.

V. CONCLUSION

This document describes CP&L's planned activities for reconstituting the H. B. Robinson Nuclear Plant's design basis and provides the proposed schedule for implementing those activities. It is CP&L's desire to work closely with the NRC on this effort to assure mutual satisfaction with the results.

H. B. Robinson Steam Electric Plant - Unit 2  
Proposed Design Basis Reconstitution Project Schedule



\*Pilot Program System DBD

\*\*Post Accident Response Portions Only