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SUBJECT: Supplemental response to violations noted in Insp Rept  
 50-261/89-02.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
INSPECTION REPORT NO. 50-261/89-02 SUPPLEMENTAL RESPONSE

Gentlemen:

NRC Inspection Report No. 50-261/89-02 identified a Severity Level IV violation (RII-89-02-01), in that Corrective Maintenance Procedure, CM-010, "Service Water Pump Overhaul," Revision 1, did not adequately prescribe activities affecting quality. This resulted in the service water pumps being operated in a degraded mode for a period of five years. As detailed within our March 15, 1989, Response to the Notice of Violation, Carolina Power and Light Company (CP&L) initiated a revision to CM-010 as the initial corrective action.

As additional corrective action to avoid further violations, CP&L acknowledged previously recognized procedure inadequacies and was to provide a Supplemental Response which described the scope, plan, and schedule for a Procedure Upgrade Program, as it relates to the Maintenance procedures. The purpose of this Supplemental Response is to transmit this information as described in our initial Response to the Notice of Violation.

The Procedure Upgrade Program was implemented within the Maintenance Subunit by Maintenance Instruction, MI No. 18, "Maintenance Procedure Upgrade Process," which was made effective April 12, 1989. The stated objectives of this upgrade program, as provided within MI No. 18, are as follows:

1. To ensure technically accurate, human factored, complete, consistent, and clear instructions are available for conducting plant activities.
2. To ensure the operational correctness and usability of procedures through validation, as appropriate.

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3. To upgrade Maintenance procedures to comply with the requirements of MMM-002 (Maintenance Procedure Preparation instructions).
4. To involve the appropriate shop personnel, operators, engineers, and other support personnel in the upgrade process to ensure that:
  - a. Existing procedure problems are corrected.
  - b. The upgraded procedures contain an adequate level of detail for the end users.

MI No. 18 defines a "project organization" within the Maintenance Subunit which will consist of the Maintenance Supervisor, a Procedures Project Manager, and a Procedures Coordinator. The program also identifies a wide cross-section of plant personnel to be involved in the procedure review and upgrade process as Procedure Reviewers. These personnel include, but are not limited to, Maintenance Foreman and Crews, Maintenance Planners, the Preventative Maintenance Coordinator, System Engineers, Operations Personnel, ALARA Representatives, and Quality Assurance Representatives.

The program has as its initial target a minimum "review rate" of one procedure per crew each week, with a maximum "review rate" of three procedures per crew each week. Using a projected start date of April 1, 1989, and a best estimate of workload and available manpower, the projected date of completion for the procedure review and upgrade is 84 weeks following the start date. Based on these estimates, this program should be completed by the end of 1990.

If you have any questions concerning this submittal, please contact Mr. J. M. Curley at (803) 383-1367.

Very truly yours,



C. R. Dietz  
Manager

Robinson Nuclear Project Department

CTB:bah

cc: Mr. S. D. Ebnetter  
Mr. L. W. Garner  
INPO