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

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23

NRC 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. Within a Supplemental Response to this violation, dated May 4, 1989, Carolina Power and Light Company provided the scope, plan, and schedule for a Procedure Upgrade Program as it related to the plant Maintenance procedures. Using projections of available manpower, expected procedure review rates, and overall project scope, it was estimated that this Maintenance Procedure Upgrade would be completed by the end of 1990. However, based on a review of the current status of the project, and an estimate of expected progress through year-end, it is clear that the project cannot be completed, with acceptable results, within the previously estimated schedule.

The original project plan and schedule was developed based upon the application of existing Maintenance personnel to the expected project workload. However, after over a year of experience with the upgrade program, it has been determined that the original plan and schedule was overly optimistic. The original expectations of required personnel resources have simply been unable to support the expected procedure upgrade rate. Also, implementation of various programmatic changes has been necessary, which has further slowed and complicated the procedure review and upgrade process. These changes include the implementation of revised guidance for upgrading of procedures and performance of 10CFR50.59 safety reviews, and incorporation of specific guidance relative to bolting and torquing practices.

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Although the original plan and schedule has not supported completion of the project by the originally committed due date, significant progress has been made. Of the total of 511 identified procedures, 113 have been completed, which represents 22% of the total. Also, 137 procedures are currently being upgraded and reviewed, which represents an additional 27% of the total. This leaves 261 procedures, or 51% of the total, that remain to be processed.

To help facilitate project completion by the revised due date while supporting planned and on-going maintenance activities, a revised project plan has been developed. This plan includes the prioritization of outstanding procedures. Maintenance procedures identified as important to safety, and those needed to support the current refueling outage will be completed, with other procedures already in the upgrade/review process to be completed by the end of 1990. Then, beginning in 1991, supplemental personnel will be added to the project staff to facilitate completion of the remaining procedures by the end of 1992. The revised project plan, in conjunction with the actions taken to provide additional personnel resources, will assure completion of the project by the revised due date, with each upgraded procedure being technically accurate, performing its intended function, and incorporating substantive human engineering improvements.

Based on the above, the completion date for the Maintenance Procedure Upgrade should be revised to December 31, 1992.

Should you have any questions regarding this submittal, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



C. R. Dietz
Manager

Robinson Nuclear Project Department

CTB:sgk

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