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 RECIP. NAME: RECIPIENT AFFILIATION
 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Forwards addl info re Generic Ltr 83-28, Items 2.1 & 2.2.2,
 per 850315 request. Technical manual update program will be
 phased in to better control existing balance-of-plant vendor
 manuals.

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Carolina Power & Light Company

SERIAL: NLS-85-164

MAY 22 1985

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
ADDITIONAL INFORMATION REGARDING GENERIC LETTER 83-28,
ITEMS 2.1 AND 2.2.2

Dear Mr. Varga:

Your letter of March 15, 1985 requested additional information necessary to complete your review with regard to Generic Letter 83-28, items 2.1 and 2.2.2. Carolina Power & Light Company's response to your request is enclosed.

Questions your staff may have regarding this matter may be referred to Mr. Steve Chaplin at (919) 836-6623.

Yours very truly,

S. R. Zimmerman
Manager

Nuclear Licensing Section

SDC/ccc (1481SDC)

Enclosure

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

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ITEM 2.1

Licensee needs to submit detailed information describing his vendor interface program for reactor trip system components. Information supplied should state how the program assures that vendor technical information is kept complete, current, and controlled throughout the life of the plant and should also indicate how the program will be implemented at HBR2.

RESPONSE

HBR2's reactor trip system is supplied by Westinghouse (NSS vendor). CP&L has verified that Westinghouse Technical Bulletins applicable to HBR2 have been received. The recommendations of the Westinghouse Technical Bulletins on reactor trip breakers have been reviewed by CP&L and acted upon. Westinghouse has incorporated return receipt letters into their Technical Bulletins. These return receipt letters are followed-up by Westinghouse if the receipt is not returned within a reasonable time. Westinghouse is also providing an updated list of Technical Bulletins which CP&L will use as an additional tool in ensuring that applicable Technical Bulletins have been received. Westinghouse has issued a complete list of past recommendations on NSS equipment. The index of the recommendations is also updated periodically to ensure the plant is aware of the issued recommendations.

Once the Technical Bulletins are received, the vendor recommendations are processed in accordance with our engineering procedure: H. B. Robinson Performance Program Procedure No. 11, Assurance of Operating Equipment Parameter and Limits. Vendor recommendations concerning plant equipment are tracked by the Performance Engineering subunit and routed to the Onsite Nuclear Safety Unit for inclusion in the Operating Experience Feedback Program. This program ensures that the information is provided to Operations or Maintenance or other appropriate organizations for their use. The recommendation is tracked until final disposition occurs.

HBR2 has implemented Records Management Procedure RMP-007, Control of Technical Manuals, to ensure that the current plant-accepted Technical Manuals are controlled and made available to plant activities. This procedure assures the master copy of each Technical Manual is kept by Document Control and copies are maintained and made available for use. Once the Technical Manual has been accepted for use, Document Control will assign a technical manual copy number to the control number.

At HBR2, no distinction is made for processing of vendor information for the reactor trip system components and other safety-related equipment. Established controls provide for processing of vendor information with the same methodology established for all Technical Manuals and Bulletins received.

In summary, CP&L believes the current vendor interface program as applied to the reactor trip system components in conjunction with established plant procedures for maintenance, surveillance testing, equipment repair and replacement, and quality assurance program provides a comprehensive equipment reliability program throughout the life of the plant. In addition, CP&L is planning to phase in a Technical Manual Update Program to better control existing BOP Vendor Manuals which were not processed with our existing vendor interface program.

ITEM 2.2.2

Licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at Robinson 2. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet each element of item 2.2.2 concern.

RESPONSE

As conveyed in the response to item 2.1, no distinction is made for processing of vendor information for the reactor trip system components and other safety-related equipment. Established controls provide for processing of vendor information with the same methodology established for all Technical Manuals and Bulletins received.

CP&L has reviewed the NUTAC Vendor Equipment Technical Information Program (VETIP) and considers that the NUTAC effort provides effective guidelines in establishing a vendor interface program.

The VETIP as defined in the March 1984 NUTAC document is considered a valid response to Section 2.2.2 of the NRC Generic Letter 83-28. CP&L is in the process of implementing a program to meet the guidelines of the NUTAC/VETIP. Accordingly, it is requested that the NRC reanalyze and reconsider your request for additional information.