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SUBJECT: Responds to violations noted in Insp Rept 50-261/90-20 re failure to obtain stabilized bearing temps.

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Carolina Power & Light Company

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United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23

NRC INSPECTION REPORT NO. 50-261/90-20: REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the notice of violation identified by NRC Inspection Report No. 50-261/90-20:

Severity Level IV Violation (RII-90-20-01)

Technical Specifications (TS) Section 4.0.1a requires in part that, inservice testing of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55 a(g). Section XI of the 1977 ASME Boiler and Pressure Vessel Code, paragraph IWP-3500, Duration of Tests, requires in part that, each pump shall be run until bearing temperatures stabilize, and then the quantities specified shall be measured or observed and recorded. A bearing temperature shall be considered stable when three successive readings taken at 10 minute intervals do not vary by more than 3 percent. Bearing temperatures for the safety injection (SI), containment spray (CS), auxiliary feedwater (AFW), and residual heat removal (RHR) pumps were measured and recorded per procedures EST-005, -007, -013, and -089, respectively.

Contrary to the above, stabilized bearing temperatures were not obtained for the SI, CS, AFW, and RHR pumps as required by TS 4.0.1a and IWP-3500, in that, from 1986 to 1990 during 14 performances of EST-005, 8 performances of EST-007, 6 performances of EST-013, and 4 performances of EST-089, the respective pumps were not run for a sufficient length of time to obtain stable bearing temperatures as required and defined by IWP-3500.

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Reply

1. Admission or denial of the violation

CP&L acknowledges this violation.

2. The reason for the violation

This violation is attributed to the lack of thoroughness, adequacy, and timeliness of reviews of bearing temperature stabilization data.

The construction permit for H. B. Robinson was issued prior to January 1, 1971. In accordance with 10 CFR 50.55a(g)(4), the plant must meet the requirements of the code "to the extent practical within the limitations of design, geometry and materials of construction of the components." This requirement has been met.

The original submittal of the Second Ten Year Interval Inservice Testing (IST) Program requested relief from the bearing temperature measuring requirement of ASME Code (code) Section XI, Table IWP-3100-1, and as further described in sub-article IWP-3500(b). This relief request was based on the length of time required to obtain stabilized bearing temperatures and low probability of detecting a bearing failure during an annual measurement. The relief request also addressed the November 28, 1979 minutes from the Operating and Maintenance Working Group meeting that recommended deletion of the bearing temperature measurement requirement. In the Safety Evaluation Report (SER) of December 23, 1985, this relief request was denied. The report stated that sufficient technical justification had not been supplied, and referred to the fact that the Working Group recommendation had not been included in the latest code edition.

On January 9, 1986, CP&L representatives met with the NRC to discuss the December 23, 1985 SER. During that meeting, CP&L presented the reasons why the approved program could not be implemented during the following refueling outage. On January 17, 1986, by CP&L letter serial NLS-86-026 to Mr. Lester S. Rubenstein, CP&L requested relief from implementing the approved program until a revised program could be resubmitted and the issue resolved. The revised IST program, including a revised bearing temperature relief request, was submitted to the NRC by letter dated May 2, 1986, serial NLS-86-151. In accordance with 10 CFR 50.55a(g), relief was not requested due to the design limitations, but solely on the merits of the bearing temperature measurements. The NRC review of this submittal has not yet been completed. As described in Generic Letter 89-04, H. B. Robinson is one of the plants that has an SER issuance pending.

While awaiting approval of the relief request, the bearing temperature requirement of the code has been met to the extent practical based on the design limitations.

At conditions above cold shutdown, some pumps can only be tested while operating in a minimum flow recirculation loop. These pumps have run time limitations in this configuration as stated by the manufacturer. Bearing temperature measurements for these pumps have continued to be taken on an annual frequency. Since these pumps have limited run times while in recirculation, bearing temperatures do not stabilize (i.e., three successive readings taken at ten minute intervals that do not vary by more than three percent). These unstabilized readings have been evaluated under the requirements of IWP-3230(c) of the code as results that do not meet prescribed acceptance criteria. CP&L recognizes that the quality, completeness, and timeliness of these reviews were not consistent, and were not auditable as QA Records. As such, the evaluations for some tests cannot be considered adequate. Therefore, CP&L agrees IWP-3230(c) was not met. This is the basis for acknowledgment of the violation.

3. The corrective steps which have been taken and the results achieved

Actions are currently in progress to procedurally specify methodology for prompt evaluation of bearing temperatures that do not stabilize during performance of annual testing. These actions include obtaining operability reviews as well as specifying appropriate corrective actions as necessary. This process will ensure that the reviews are obtained in a timely manner, adequately specify acceptability of non-stabilized bearing temperature data, and that the technical evaluation adequately addresses trending the deviations from previous tests in order to determine if potential component degradation exists. Additionally, the implementing procedures will be reviewed and any changes required to recognize the design limitations and to specify actions required for unacceptable bearing temperature readings will be incorporated.

4. The corrective steps that will be taken to avoid further violations.


The corrective actions stated above are considered sufficient to preclude further violations of this nature.

5. The date when full compliance will be achieved.

Full compliance will be achieved prior to startup from the current refueling outage.

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

Very truly yours



Charles R. Dietz
Manager

Robinson Nuclear Project Department

RDC

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