Official

December 5, 1991

Docket No. 50-261
License No. DPR-23

Carolina Power and Light Company
ATTN: Mr. Lynn W. Eury
Executive Vice President
Power Supply
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-261/91-201

We have completed our review of your response, dated November 2, 1991, to the Notice of Violation identified in Inspection Report 50-261/91-201. After careful review of your response, we have concluded that the violation occurred as written. The basis for our conclusion is discussed in the enclosure. Please respond to the four questions presented in our Notice of Violation dated October 4, 1991.

We appreciate your cooperation with us.

Sincerely,

Original signed by
Stuart D. Rubin/for

Albert F. Gibson, Director
Division of Reactor Safety

Enclosure:
As stated

cc w/encl:
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R. H. Chambers, Plant General Manager
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(cc cont'd - See page 2)

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IE01

(cc cont'd)
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RII:DRS	RII:DRS	RII:DRP		RII:DRS	RII:EICS
FJape:er	CJulian	CChristensen	NRR Jacobson (by phone) 12/4/91	AGibson	GJenkins
11/5/91	11/25/91	11/25/91		11/5/91	11/25/91

ENCLOSURE

The violation was written against 10 CFR 50, Appendix B Criterion XVI, Corrective Action, because we believe that actions taken on April 15, 1991 and shortly thereafter were not in agreement with your corrective action program in effect at that time. Procedure PLP-026, Rev. 5 states, in Attachment 7.3, that an ACR should be prepared if a deficiency meets the following:

17. Deficiency in Equipment Subject to 10 CFR 50, Appendix B - Failures, malfunctions, deficiencies, deviations, defective material and equipment as they pertain to safety-related activities, processes, equipment (not covered by a subprogram).

The galled stem of Valve V-2-6A is an example of a component deficiency subject to 10 CFR 50, Appendix B. Instead only a work request was initiated. Work requests were not considered part of the subprogram in PL-026 at the time this issue was found. The actions taken to correct Valve V-2-6A deficiencies and determine operability were not documented as they would have been if an ACR had been prepared. We recognize that the actions taken were essentially the same and that Valve V2-6A was subsequentially tested on August 16, 1991 and found to be "operable."

In your November 2, 1991 response you stated that the feedwater block valves and the feedwater regulating valves are redundant in so far as the safety analysis for this valve. We believe that the feedwater regulating valve is not credited in safety analyses for which the block valve provides the required integrity for the auxiliary feedwater system. In the analyses the regulating valve is assumed to fail open.

With regard to the question on adequate motor operator size for opening V2-6A we request that you provide the basis for your calculation and have it available on site for our review during a followup inspection. The calculation performed by the NRC used 1525 psid since this was considered to be the worst case. We understand that you have modified the design basis calculation to around 365 psid. At this differential, NRC would agree that the operator size is satisfactory. We would like to review your reason for this change in design basis during a followup inspection.