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 AUTH.NAME      AUTHOR AFFILIATION  
 DIETZ,C.R.      Carolina Power & Light Co.  
 RECIP.NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 920106 ltr re violations noted in insp rept:  
 50-261/91-201. Corrective actions: SWACG work listing was  
 revised adding V2-6A as item under evaluation.

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Company Correspondence

**ROBINSON NUCLEAR PROJECT DEPARTMENT**

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Serial: RNP/92-0014

United States Nuclear Regulatory Commission  
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H. B. ROBINSON STEAM ELECTRIC PLANT  
UNIT NO. 2

DOCKET NO. 509-261  
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NRC INSPECTION REPORT NO. 50-261/91-201 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in Inspection Report 50-261/91-201.

Severity Level IV Violation (RII-91-201)

10 CFR 50 Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and action taken to preclude repetition.

Contrary to the above, conditions that questioned the operability of a motor operated valve were not properly identified or evaluated to determine equipment operability and the appropriate corrective action. An Adverse Condition Report (the Licensee's document for identifying discrepant conditions) was not issued for severe valve stem galling identified on April 15, 1991, on main feedwater isolation valve V2-6A. Although this deficiency was documented on a work request, no engineering evaluation or operability determination was performed on this valve. In addition, corrective action taken in response to a previous violation relating to this valve appeared to be inadequate.

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The previous violation (50-261-89/200) documented three instances of thermal overload trips for this valve without proper documentation or evaluation. CP&L acknowledged this violation and their response stated that an "extensive evaluation was performed, including actuator sizing..." During this recent inspection, as a result of operability questions resulting from the valve stem galling, the NRC performed calculations which indicated the motor operator for the V2-6A valve is undersized for valve opening.

REPLY

1. Reason for the Violation

As stated in the Notice of Violation, stem galling was observed on valve V2-6A on April 15, 1991. At that time, the Shift Foreman determined that no Operability Determination was called for. Therefore, the operating crew issued a Work Request to document the condition and to initiate repairs.

2. The Corrective Steps That Have Been Taken and the Results Achieved

The following actions were taken to evaluate the effects of the galled stem.

- A. Plant Operating Manual procedure OMM-039, "Operability Determination", is utilized when a condition or question is raised regarding the capability of safety related equipment to perform its function in accordance with the Technical Specifications. When the galled valve stem was initially discovered, operating shift personnel discussed the condition and determined that, from an equipment operability standpoint, it did not warrant entry into a formal Operability Determination in accordance with this procedure.
- B. The Site Work Activities Control Group (SWACG) provides a forum for the planning, scheduling, execution, and control of work activities performed while Unit 2 is in the operating mode. This group meets each workday, and is attended by each work group and the on-call Manager. On April 16, (the day after the galled stem was observed) the SWACG work listing was revised, adding V2-6A as an item under evaluation. As such, this process brought the item to the attention of appropriate Plant personnel. Visual inspection of the condition was performed by Technical Support personnel, and their engineering judgement confirmed the position that the valve was operable.

- C. On April 23, as part of the Technical Support review of the condition, Corporate Fuels personnel were contacted to determine the significance of a hypothetical failure of V2-6A to close. The discussion addressed the feedwater block valves acting in concert with feedwater regulating valves, and given the extent of the stem galling, the condition of V2-6A was confirmed on the basis of engineering judgement not to be an operability issue.
- D. On May 15, 1991, the V2-6A stem was polished with a fine emery cloth, reducing the extent of the galled condition. The straightness of the packing follower was checked, and found to be satisfactory. Based on the lack of any information indicating valve inoperability, the previous considerations on operability were confirmed. The existence of previous test data obtained under static conditions which demonstrated that the valve would have sufficient thrust capability to operate under opening conditions further confirmed this position.
- E. The Work Request process was not initially considered a formal subprogram of the Corrective Action Program. Plant procedures were revised in August, 1991 to identify a Work Request as a Subprogram within the Corrective Action Program to meet the requirements of 10 CFR 50, Appendix B.

3. Corrective Steps That Will Be Taken to Avoid Further Violations

On August 16, 1991, the plant was taken to hot shutdown conditions for unrelated reasons. This provided an opportunity to cycle the valve to assure that previous considerations for valve operability were in fact correct. The valve was closed satisfactorily within a time of 62 seconds, which is consistent with previous stroke times. Motor currents measured during two valves cycles compared favorably with the January 5, 1991 baseline testing data.

With regard to the sizing of the motor operator for V2-6A, CP&L's position has been previously stated in response to inspection report 91-201. This response stated that the active safety function of the valve is to close on receipt of a Safety Injection (SI) signal, and the valve does not have a safety function to open during any analyzed accident scenario. However, because of the closing function requirements, the valve is considered a part of the Generic Letter 89-10 program, and the capability for the MOV to function in the opening direction was evaluated. Based on the results of this evaluation, the valve is in fact adequately sized to function in the opening direction.

The original opening differential pressure calculation used the maximum credible upstream line pressure (1525 psig) while assuming a downstream pressure of zero psig. It is this conservatism that resulted in the calculation that indicated the apparent undersizing of the actuator.

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Because valve opening is not a safety related operation, this condition/calculation was determined to have no affect on valve operability. Therefore, no steps to determine the actual opening differential pressure were made and the opening calculation was not revisited at that time.

In response to the June, 1991 audit finding concerning this issue, a calculation using expected opening differential pressures was performed. Based on the results of this calculation, the valve is in fact adequately sized to function in the opening direction.

No steps in addition to those stated above are planned to be taken to avoid further violations.

4. Date When Full Compliance Will be Achieved

Full compliance is considered to be complete with the actions stated above.

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

Very truly yours,



Charles R. Dietz  
Vice President

Robinson Nuclear Project Department

RDC:dwm

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