

July 15, 1994

Docket No. 50-261

Mr. C. S. Hinnant, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
Post Office Box 790
Hartsville, South Carolina 29551-0790

SUBJECT: REVIEW OF RESPONSE TO SAFETY EVALUATION OF INSERVICE TESTING PROGRAM
RELIEF REQUEST ANOMALIES - H. B. ROBINSON STEAM ELECTRIC PLANT,
UNIT NO. 2 (TAC NO. M88476)

On December 6, 1993, Carolina Power & Light Company (the licensee) responded to the NRC concerning anomalies the NRC identified in the September 16, 1992, Safety Evaluation (SE). The SE was issued on the inservice testing (IST) program relief requests for the third ten-year interval program for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR). The NRC finds the actions described in the licensee's response to each of the anomalies is acceptable, with the two comments provided below.

In the response to Item 9, the licensee indicates that certain valves which are not ASME Code Class 1, 2, or 3 are included in the program in accordance with Generic Letter (GL) 89-04, Position 11. The IST program should reflect that these valves are non-Code, and that the associated relief request (GVRR-1) does not require approval by NRC for these valves. The testing described for the remaining valves included in GVRR-1 meets the requirements of OM-10, Paragraph 4.3.2.2 for stroking to the position required to perform their safety function, and is acceptable pursuant to 10 CFR 50.55a(f)(4)(iv).

With regard to Item 13, the licensee indicates that Relief Request SI-VRR-3 is withdrawn because the subject valves are disassembled and inspected in accordance with guidance in Position 2 of GL 89-04. The relief request should be revised to reflect the application of Position 2 as an acceptable alternative for full-stroke exercising of the check valves in accordance with GL 89-04, or the IST program should otherwise be revised to comply with the GL guidance for documentation in the IST program indicating conformance to the provisions of Position 2.

This completes the NRC efforts regarding TAC number M88476.

Sincerely,

ORIGINAL SIGNED BY:

Brenda L. Mozafari, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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In the response to Item 9, the licensee indicates that certain valves which are not ASME Code Class 1, 2, or 3 are included in the program in accordance with Generic Letter (GL) 89-04, Position 11. The IST program should reflect that these valves are non-Code, and that the associated relief request (GVRR-1) does not require approval by NRC for these valves. The testing described for the remaining valves included in GVRR-1 meets the requirements of OM-10, Paragraph 4.3.2.2 for stroking to the position required to perform their safety function, and is acceptable pursuant to 10 CFR 50.55a(f)(4)(iv).

With regard to Item 13, the licensee indicates that Relief Request SI-VRR-3 is withdrawn because the subject valves are disassembled and inspected in accordance with guidance in Position 2 of GL 89-04. The relief request should be revised to reflect the application of Position 2 as an acceptable alternative for full-stroke exercising of the check valves in accordance with GL 89-04, or the IST program should otherwise be revised to comply with the GL guidance for documentation in the IST program indicating conformance to the provisions of Position 2.

This completes the NRC efforts regarding TAC number M88476.

Sincerely,

A handwritten signature in cursive script that reads "Brenda Mozafari".

Brenda L. Mozafari, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
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