

June 1, 1992

Docket No. 50-261

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Mr. R. A. Watson  
Senior Vice President  
Nuclear Generation  
Carolina Power & Light Company  
P. O. Box 1551  
Raleigh, North Carolina 27602

Dear Mr. Watson:

SUBJECT: INSERVICE TESTING PROGRAM REVIEW - H. B. ROBINSON STEAM ELECTRIC  
PLANT, UNIT NO. 2 (TAC NO. M81309)

By letter dated August 1, 1991, you submitted the H. B. Robinson Steam Electric Plant, Unit No. 2, Inservice Testing (IST) Program for the third ten-year interval that runs from February 19, 1992, to February 18, 2002. Pursuant to 10 CFR 50.55a, you have requested relief from certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) testing requirements for specific pumps and valves.

We have performed a preliminary review of your IST submittal. With the five exceptions specified in the enclosure, we have determined, on an interim basis, your relief requests and the associated alternative test procedures are acceptable until our in-depth evaluation is completed. The five exceptions or relief request denials were discussed with your staff during a telephone conference on February 6, 1992, and your staff indicated agreement with our position on those denials. Also, pending the completion of our review, other denials may be necessary.

Sincerely,  
Original signed by:  
Elinor G. Adensam, Director  
Project Directorate II-I  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated  
cc w/enclosure:  
See next page

OFC	LA:PDII-1	PM:PDII-1	D:PDII-1	
NAME	PANDerson:	BMOZafari: dw	EAdensam	
DATE	4/17/92	4/25/92	4/28/92	

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Mr. R. A. Watson  
Carolina Power & Light Company

H. B. Robinson Steam Electric Plant,  
Unit No. 2

cc:

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Special Deputy Attorney General  
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LIST OF RELIEF REQUEST DENIALS

1. GPRR-4 requests relief from the instrument accuracy and full-scale range requirements of the Code for digital instruments used for testing safety-related pumps. Digital instruments do not have indication scales or graduations and are equally accurate for all readings over wide ranges. Therefore, the full scale range requirements of IWP-4120 are not appropriate for these instruments when they are used for measurements within their calibrated range as specified by the manufacturer. Relief should be granted from the code range requirements for digital instruments, provided they are used per the operating instructions provided by the instrument manufacturer.

The licensee proposed to use digital instrumentation with an accuracy of  $\pm 3\%$  or better at any point of the calibrated range. The proposed digital instruments may provide measurements that are sufficiently repeatable to monitor pump condition and detect degradation. However, the licensee has not indicated the specific applications where these digital instruments might be used. Further, they have not indicated if the currently utilized test instruments in these applications provide more accurate measurements of the test parameters. It may not be appropriate to permit the use of instruments that do not meet the Code accuracy requirement when more accurate instruments are available for pump testing. Therefore, general relief cannot be granted as requested.

For specific applications where the digital instruments provide more accurate and repeatable measurements than the currently used test instruments, the use of these digital instruments should be acceptable. However, if there is significant data scatter of the test measurements so the allowable ranges of Table IWP-3100-2 cannot be applied, it is questionable that the measurements are sufficiently repeatable to detect pump degradation and use of the instruments may not be acceptable. The licensee should resubmit this relief request and document the specific applications where digital instruments that are less accurate than  $\pm 2\%$  are to be used.

2. GPRR-6 requests relief from the corrective action requirements of the Code for all safety related pumps. The licensee proposed to allow a 72 hour evaluation period prior to declaring pumps that fall into the Required Action Range inoperable. Pump test parameters in the Required Action Range can indicate significant pump degradation. Section XI testing is intended to detect degradation of a pump and to provide

assurance that adequate margins are maintained. When test data indicate that the margins are significantly reduced, the unrestricted 72-hour grace period proposed by the licensee is not acceptable. The licensee has not adequately demonstrated that complying with this Code requirement is impractical or that it presents a hardship without a compensating increase in the level of quality and safety. Therefore, relief cannot be granted as requested; and the licensee should comply with Position 8 of GL 89-04.

3. GVR-3 requests relief from the corrective action requirements of the Code for all safety related power operated valves in the IST program. The licensee proposed to allow a 72-hour evaluation period prior to declaring valves that fall into the Required Action Range inoperable. Significant increases in valve stroke time can indicate significant valve degradation. Section XI testing is intended to detect degradation of components and to provide assurance that adequate margins are maintained. When test data indicate that the margins are significantly reduced, the unrestricted 72-hour grace period proposed by the licensee is not acceptable. The licensee has not adequately demonstrated that complying with this Code requirement is impractical or that it presents a hardship without a compensating increase in the level of quality and safety. Therefore, relief cannot be granted as requested; and the licensee should comply with Position 8 of GL 89-04.
4. IVSW-VRR-1 requests relief from the test frequency requirements of Section XI for the check and power-operated valves in the Isolation Valve Seal Water (IVSW) system. The licensee proposed to exercise these valves per the Code during each refueling outage. PCV-1922A and -1922B are indicated in the IST program to be normally closed. They are in parallel paths with in-line isolation valves. The licensee has not shown that these valves cannot be exercised quarterly or each cold shutdown per the Code requirements. The proposed alternative is not shown to provide an acceptable level of quality and safety. The licensee has not shown that a hardship would result from testing these valves at the Code frequency and that there would be no compensating increase in safety. Whereas it may be inconvenient to exercise the valves at the Code frequency, it is not shown to be impractical. Therefore, relief cannot be granted.

5. SI-VRR-1 requests relief from the test frequency requirements of the Section XI, Paragraph IWV-3521, for safety injection (SI) test line check valve, SI-849. The licensee proposed to full-stroke exercise this valve with flow each refueling. The test return line is equipped with a flow indicator that can be used to verify a full-stroke open exercise of this valve with flow. There are two normally closed manually operated valves in the test return line. Whereas it might be impractical to open these manual valves quarterly during power operation, the licensee has not shown that the test is impractical or burdensome, either quarterly or during cold shutdowns. Therefore, the proposal to full-stroke exercise this valve with flow each refueling outage is not shown to be a reasonable alternative to the Code test frequency requirements. Therefore, relief cannot be granted from the Code test frequency requirements.

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PDII-1 Rdg.

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cc: Service List