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SUBJECT: Responds to 920916 SE of inservice testing program relief requests,per 920617 telcon & forwards revised relief request GPRR-4 & IVSW-VRR-1.SI check valve SI-849 currently full stroke tested at cold shutdown intervals.

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DEC 28 1992

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Vice President
Nuclear Services Department

SERIAL: NLS-92-342

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
RESPONSE TO SAFETY EVALUATION OF THE INSERVICE TESTING (IST) PROGRAM
RELIEF REQUESTS

Gentlemen:

The purpose of this letter is to respond to your "Safety Evaluation of the Inservice Testing (IST) Program Relief Requests, H. B. Robinson, Unit No. 2," dated September 16, 1992. This response addresses actions taken for those relief requests that were denied and comments on the documentation of a June 17, 1992 conference call.

Resolution of Denied Relief

General relief was denied for GPRR-4 concerning the use of digital instruments accurate to 3 percent of reading. A revised relief request is included as an enclosure to this letter.

Relief was denied for relief requests GPRR-6 and GVRR-3 concerning a 72-hour evaluation period prior to declaring pumps and valves, respectively, inoperable based on test results. These relief requests have been withdrawn from the H. B. Robinson IST Program.

Relief was denied for relief request IVSW-VRR-1 for power-operated valves. This relief request concerns the testing of various Isolation Valve Seal Water (IVSW) system valves. Relief was denied for the extended test frequency for power-operated valves in the IVSW system. Specifically, the valves denied relief (PCV-1922A and PCV-1922B) are currently being tested at cold shutdown intervals. A revised request IVSW-VRR-1 is enclosed that removes reference to these valves.

Relief was denied for request SI-VRR-1 concerning the interval for full-stroke exercising of SI check valve SI-849. This valve is currently full-stroke tested at cold shutdown intervals. A revised request SI-VRR-1 is enclosed that removes reference to this valve.

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June 17, 1992 Conference Call

The Safety Evaluation (SE) contains discussion of a June 17, 1992 conference call which differs with CP&L's understanding of that discussion. Section 2.2 of the SE discusses testing of the check valves SI-875 A/B/C; it states that the licensee performed full-stroke exercising of these valves using ultrasonic non-intrusive techniques to verify disc movement during the flow test. In fact, the check valves were tested using ultrasonic non-intrusive techniques; however, the test utilized Controlotron meters to verify adequate flow to achieve full disk movement versus direct disk measurement. This test was performed in accordance with the Third Ten-Year IST Program for which interim approval was granted by a June 1, 1992 letter. Additionally, valve SI-875C was disassembled and inspected during the 1992 refueling outage.

Additionally, Section 2.3 of the SE discusses the testing of check valves 874A and B; it states that the valves were tested, and that full flow was monitored for both valves individually. In fact, the testing done during the 1992 refueling outage was in accordance with the Third-Ten Year IST Program, relief request SI-VRR-6, as submitted by letter dated August 1, 1991, for which interim approval was granted by the June 1, 1992 letter. This test verified full flow through the valves in parallel. This relief request is being withdrawn, and further testing of each check valve will be in accordance with the provisions of Generic Letter 89-04. Procedure changes are currently being prepared which will allow individual full-stroke testing during the next refueling outage.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,

R. B. Starkey, Jr.

JSK/jbw

Enclosures

cc: Mr. S. D. Ebneter
Mr. L. W. Garner
Ms. B. L. Mozafari

REVISED RELIEF REQUEST NO. GPRR-4

1. Identification of Components:

Charging Pumps A, B, and C
Component Cooling Water Pumps A, B, and C
Diesel Fuel Oil Transfer Pumps A and B
Residual Heat Removal Pumps A and B
Service Water Pumps A, B, C, and D
Containment Spray Pumps A and B
Safety Injection Pumps A, B, and C
Boric Acid Pumps A and B

2. ASME Section XI Code Requirement:

The full-scale range of each instrument shall be three (3) times the reference value or less (IWP-4120).

3. Code Relief Request:

Relief is requested from the maximum range of three times the reference value for digital instruments used during IST testing activities, on the above listed systems/components. In addition, should a 2% accurate instrument become disabled, the use of an intrinsic 3% accurate instrument is requested until a 2% instrument is returned to service.

4. Justification for Requesting Relief:

Digital instrumentation generally does not have a defined upper end to the scale like analog instrumentation. Also, such instrumentation with upper ranges to meet the various test applications of the code are not generally available. Due to the early design of the H. B. Robinson plant, calibrated flow instrumentation was not provided to meet ASME Section XI code requirements for assessing safety-related component performance. In order to better assess component conditions, and to be in compliance with the ASME code requirements, digital flow instruments were installed. These instruments were initially calibrated to a 2% of actual flow or better accuracy prior to permanent installation. Flow ranges were specified for this calibration based on three times the anticipated reference value for each test application. Site-specific calibrations, traceable to NIST standards or equivalent, were performed in the manufacturer's test facility for each test arrangement for the components specified above.

Based on manufacturer's documentation, these instruments will also demonstrate an intrinsic accuracy of 3% or better of actual readings, without a special calibration being performed. Based on calculations, an intrinsic 3% of actual flow readings would be equivalent to or better, in accuracy, than the ASME Section XI code 2% of full scale. Therefore, should a 2% accurate instrument become disabled, the temporary use of an instrument capable of 3% of actual reading is requested. This relief is considered necessary due to the special calibration conditions, i.e., a flow loop arrangement in the manufacturer's facility, that would be required in order to restore a 2% accurate instrument to service. It should be noted that 3% accurate instruments would only be used to meet code-specified testing intervals should a 2% instrument become disabled. This would be a temporary arrangement only until the 2% instrument could be restored.

5. Alternative Testing:

To the maximum extent possible, digital flow instrumentation, which is calibrated to a 2% of actual flow tolerance, will be utilized during test activities on the above listed systems/components. Should a 2% of actual flow calibrated instrument become disabled, an intrinsic 3% accurate instrument will be utilized for test activities, until such time the 2% accurate instrument can be returned to service.

Using either 2% or 3% instrumentation with calibration based on actual flow rates will provide readings equivalent, or better, in accuracy to the code-required calibrations based on full scale.

REVISED RELIEF REQUEST NO. IVSW-VRR-1

1. Identification of Components:

   All check valves in the Isolation Valve Seal Water (IVSW) System.

2. ASME Section XI Code Requirement:

   Subsection IWV requires all check valves that are required to perform specific functions in shutting down a reactor to the cold shutdown condition in mitigating the consequences of an accident to be exercised quarterly to the position required to fulfill their function.

3. Code Relief Request:

   Relief is requested from exercising all check valves in the IVSW system quarterly.

4. Justification for Requesting Relief:

   The IVSW system has been accepted by the NRC as meeting the requirements of a seal system as defined by 10 CFR 50 Appendix J. The system is also required by Technical Specification 3.3.6 to be operational during power operations to maintain containment integrity should it be required for post-accident service.

   Quarterly and/or cold shutdown testing of the IVSW system would require the removal of associated containment isolation valves of major systems which are in use during plant operation and cold shutdown. Operation of these containment isolation valves could result in a plant trip, an inadvertent initiation of a safety signal, and/or isolation of essential features or processes.

   10 CFR 50 Appendix J requires all containment isolation valves and the seal system to be tested every refueling, not to exceed two years. Technical Specification 4.4.2 requires the IVSW system to be tested every refueling.

   Because of the unusual condition the plant must be placed in to test the IVSW system, it is impractical to test at cold shutdown.

5. Alternative Testing:

   All check valves in the IVSW system that are included in the IST Program will be tested as required by IVW every refueling outage.

REVISED RELIEF REQUEST NO. SI-VRR-1

1. Identification of Components:

   Safety Injection (SI) valves SI-873A, SI-873B, SI-873C, SI-873D, SI-873E, SI-873F, SI-874A, and SI-874B are C active whose function is to open to admit flow from the SI Pumps to the RCS during safety injection.

2. ASME Section XI Code Requirement:

   IWV-3500 requires quarterly full-flow exercise.

3. Code Relief Request:

   Relief is requested from performing the full-flow exercise quarterly.

4. Justification for Requesting Relief:

   Exercising the Hot and Cold Leg Injection check valves during power operations is not possible due to the SI Pumps not being able to develop sufficient head to overcome normal RCS pressure. Use of another pump would result in an undesirable temperature transient in the RCS. Letdown capability will not allow full-flow testing with the reactor head on during cold shutdown. Such testing at cold shutdown would increase the probability of a low-temperature overpressurization event.

5. Alternative Testing:

   Full-flow exercise at each refueling outage.