

Partial Review

EQUIPMENT EVALUATION REPORT BY THE
OFFICE OF NUCLEAR REACTOR REGULATION

FOR CAROLINA LIGHT AND POWER COMPANY

H. B. ROBINSON UNIT 2

DOCKET NO. 50-261

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3 STAFF EQUIPMENT EVALUATION

The staff evaluation of the licensee's response included an onsite inspection of selected Class IE equipment and an examination of the licensee's report for completeness and acceptability. The criteria described in the DOR guidelines and in NUREG-0588, in part, were used as a basis for the staff evaluation of the adequacy of the licensee's qualification program.

The NRC Office of Inspection and Enforcement performed (1) a preliminary evaluation of the licensee's response, documented in a technical evaluation report (TER) and (2) an onsite verification inspection (August 25-29, 1980) of selected safety-related electrical equipment. The reactor coolant; safety injection, auxiliary cooling, and heating, ventilation and air conditioning systems and electrical penetration assembly were inspected. All the equipment inspected is located inside containment. The inspection verified proper installation of equipment, overall interface integrity, and manufacturers' nameplate data. The manufacturer's name and model number from the nameplate data were compared to information given in the Component Evaluation Work Sheets (CES) of the licensee's report. The site inspection is documented in report IE 50-261/80-20. No deficiencies were noted. For this review, the documents referenced above have been factored into the overall staff evaluation.

3.1 Completeness of Safety-Related Equipment

In accordance with IEB 79-01B, the licensee was directed to (1) establish a list of systems and equipment that are required to mitigate a LOCA and an HELB and (2) identify components needed to perform the function of safety-related display information, post-accident sampling and monitoring, and radiation monitoring.

The staff developed a generic master list based upon a review of plant safety analyses and emergency procedures. The instrumentation selected includes parameters to monitor overall plant performance as well as to monitor the performance of the systems on the list. The systems list was established on the basis of the functions that must be performed for accident mitigation (without regard to location of equipment relative to hostile environments).

The list of safety-related systems provided by the licensee was reviewed against the staff-developed master list.

Based upon information in the licensee's submittal, the equipment location references, and in some cases subsequent conversations with the licensee, the staff has verified and determined that the systems included in the licensee's submittal are those required to achieve or support: (1) emergency reactor shutdown, (2) containment isolation, (3) reactor core cooling, (4) containment

heat removal, (5) core residual heat removal, and (6) prevention of significant release of radioactive material to the environment. The staff therefore concludes that the systems identified by the licensee (listed in Appendix D) are acceptable, with the exception of those items discussed in Section 5 of this report.

Display instrumentation which provides information for the reactor operators to aid them in the safe handling of the plant was not specifically identified by the licensee. A complete list of all display instrumentation mentioned in the LOCA and HELB emergency procedures must be provided. Equipment qualification information in the form of summary sheets should be provided for all components of the display instrumentation exposed to harsh environments. Instrumentation which is not considered to be safety related but which is mentioned in the emergency procedure should appear on the list. For these instruments, (1) justification should be provided for not considering the instrument safety related and (2) assurance should be provided that its subsequent failure will not mislead the operator or adversely affect the mitigation of the consequences of the accident. The environmental qualification of post-accident sampling and monitoring and radiation monitoring equipment is closely related to the review of the TMI Lessons-Learned modifications and will be performed in conjunction with that review.

The licensee identified 144 items of equipment which were assessed by the staff.

3.2 Service Conditions

Commission Memorandum and Order CLI-80-21 requires that the DOR guidelines and the "For Comment" NUREG-0588 are to be used as the criteria for establishing the adequacy of the safety-related electrical equipment environmental qualification program. These documents provide the option of establishing a bounding pressure and temperature condition based on plant-specific analysis identified in the licensee's Final Safety Analysis Report (FSAR) or based on generic profiles using the methods identified in these documents.

On this basis, the staff has assumed, unless otherwise noted, that the analysis for developing the environmental envelopes relative to the temperature, pressure, and the containment spray caustics, has been performed in accordance with the requirements stated above. The staff has reviewed the qualification documentation to ensure that the qualification specifications envelope the conditions established by the licensee. During this review, the staff assumed that for plants designed and equipped with an automatic containment spray system which satisfies the single-failure criterion, the main-steam-line-break (MSLB) environmental conditions are enveloped by the large-break-LOCA environmental conditions. The staff assumed, and requires the licensee to verify, that the containment spray system is not subjected to a disabling single-component failure and therefore satisfies the requirements of Section 4.2.1 of the DOR guidelines.

Equipment submergence has also been addressed where the possibility exists that the flooding of equipment may result from HELBs.

3.3 Temperature, Pressure, and Humidity Conditions Inside Containment

The licensee has provided the results of accident analyses as follows:

	<u>Max Temp (°F)</u>	<u>Max Press (psig)</u>	<u>Humidity (%)</u>
LOCA	265	42	100
MSLB	not provided	not provided	100

The staff has concluded that the minimum temperature profile used in the specifications for equipment qualification purposes should include a margin to account for higher-than-average temperatures in the upper regions of the containment that can exist due to stratification, especially following a postulated MSLB. Use of the steam saturation temperature corresponding to the total building pressure (partial pressure of steam plus partial pressure of air) versus time will provide an acceptable margin for either a postulated LOCA or MSLB, whichever is controlling, as to potential adverse environmental effects on equipment.

The licensee's specified temperature (service condition) of 265°F does not satisfy the above requirement. Furthermore, the licensee's specified pressure is low as compared to plants of similar design. The licensee is requested to verify that the pressure profile in the FSAR was calculated based on the Code requirements defined in NUREG-0588. If by using these codes the peak containment pressure is still 42 psig, then a saturation temperature corresponding to the pressure profile (289°F peak temperature at 42 psig) should be used. If, however, the calculated peak pressure is higher than 42 psig, the saturation temperature corresponding to the new pressure profile should be used. The licensee should update his equipment summary tables to reflect this change. If there is any equipment that does not meet the staff position, the licensee must provide either justification that the equipment will perform its intended function under the specified conditions or propose corrective action.

3.4 Temperature, Pressure, and Humidity Conditions Outside Containment

The licensee has provided the temperature, pressure, and humidity associated with an HELB outside containment, as well as applicable radiation levels associated with equipment in the proximity of recirculating fluid lines. The following area outside containment has been addressed:

(1) Auxiliary building

The licensee has used ambient temperature conditions in some areas outside containment. The staff considers saturation temperature at the peak pressure resulting from a HELB as the minimum level for acceptance. The licensee should update his summary tables to reflect this change. If there is any equipment that does not meet the staff position, the licensee must either provide justification that the equipment will perform its intended function under saturated conditions or propose corrective action.

3.5 Submergence

The maximum submergence levels have been established and assessed by the licensee. Unless otherwise noted, the staff assumed for this review that the methodology employed by the licensee is in accordance with the appropriate criteria as established by Commission Memorandum and Order CLI-80-21.

The licensee's value for maximum submergence is 231.2 ft elevation inside containment. Equipment below this level has been identified by the licensee. The licensee identified three safety-related level transmitters mounted on the shield wall as having the potential for becoming submerged after a postulated event. The licensee stated that these transmitters are not the only source of data for operator assessment and decision needed for HELB and LOCA situations; therefore, their assumed failure upon submergence does not necessitate relocation or replacement. In this regard, licensee should provide an assessment of the failure modes associated with the submergence of these transmitters. The licensee should also provide assurance that the subsequent failure of these components will not adversely affect any other safety functions or mislead an operator. Additionally, the licensee should discuss operating time, across the spectrum of events, in relation to the time of submergence. If the results of the licensee's assessment are acceptable, then these transmitters may be exempt from the submergence parameter of qualification.

3.6 Chemical Spray

The licensee has specified that boric acid solution constitutes the plant's chemical spray; however, the exact volume percent, concentration, and pH values were not provided. Therefore, for the purpose of this review, the effects of chemical spray will be considered unresolved. The staff will review the licensee's response when it is submitted and discuss the resolution in a supplemental report.

3.7 Aging

Section 7 of the DOR guidelines does not require a qualified life to be established for all safety-related electrical equipment. However, the following actions are required:

- (1) Make a detailed comparison of existing equipment and the materials identified in Appendix C of the DOR guidelines. The first supplement to IEB-79-01B requires licensees to utilize the table in Appendix C and identify any additional materials as the result of their effort.
- (2) Establish an ongoing program to review surveillance and maintenance records to identify potential age-related degradations.
- (3) Establish component maintenance and replacement schedules which include considerations of aging characteristics of the installed components.

The licensee identified a number of equipment items for which a specified qualified life was established (for examples, 5 years, 15 years, or 40 years). In its assessment of these submittals, the staff did not review the adequacy

of the methodology nor the basis used to arrive at these values; the staff has assumed that the established values are based on state-of-the-art technology and are acceptable.

For this review, however, the staff requires that the licensee submit supplemental information to verify and identify the degree of conformance to the above requirements. The response should include all the equipment identified as required to maintain functional operability in harsh environments.

The licensee indicated that this phase of the response is outstanding and that the review is in progress. The staff will review the licensee's response when it is submitted and discuss its evaluation in a supplemental report.

3.8 Radiation (Inside and Outside Containment)

The licensee has provided values for the radiation levels postulated to exist following a LOCA. The application and methodology employed to determine these values were presented to the licensee as part of the NRC staff criteria contained in the DOR guidelines, in NUREG-0588, and in the guidance provided in IEB-79-01B, Supplement 2. Therefore, for this review, the staff has assumed that, unless otherwise noted, the values provided have been determined in accordance with the prescribed criteria. The staff review determined that the values to which equipment was qualified enveloped the requirements identified by the licensee.

The value required by the licensee inside containment ranges between 9.5×10^5 to 1.5×10^8 rads for the integrated dose. These values do not envelope the DOR guideline (4×10^7 rads) requirements and therefore are not acceptable. The radiation service condition provided by the licensee is lower than provided in the guidelines for gamma and beta radiation. The licensee is required to either provide justification for using the lower service condition or use the guidelines for both gamma and beta radiation. If the latter option is chosen, then the analysis, including the basis, assumptions, and a sample calculation, should be provided.

A required value outside containment of 1.1×10^6 rads has been used by the licensee to specify limiting radiation levels within the RHR pump area of the auxiliary building. This value appears to consider the radiation levels influenced by the source term methodology associated with post-LOCA recirculation fluid lines and is therefore acceptable.

4 QUALIFICATION OF EQUIPMENT

The following subsections present the staff's assessment, based on the licensee's submittal, of the qualification status of safety-related electrical equipment.

The staff has separated the safety-related equipment into three categories: (1) equipment requiring immediate corrective action, (2) equipment requiring additional qualification information and/or corrective action, and (3) equipment considered acceptable if the staff's concern identified in Section 3.7 is satisfactorily resolved.

In its assessment of the licensee's submittal, the NRC staff did not review the methodology employed to determine the values established by the licensee. However, in reviewing the data sheets, the staff made a determination as to the stated conditions presented by the licensee. Additionally, the staff has not completed its review of supporting documentation referenced by the licensee (for example, test reports). It is expected that when the review of test reports is complete, the environmental qualification data bank established by the staff will provide the means to cross reference each supporting document to the referencing licensee.

If supporting documents are found to be unacceptable, the licensee will be required to take additional corrective actions to either establish qualification or replace the item(s) of concern. This effort will begin in early 1981.

An appendix for each subsection of this report provides a list of equipment for which additional information and/or corrective action is required. Where appropriate, a reference is provided in the appendices to identify deficiencies. It should be noted, as in the Commission Memorandum and Order, that the deficiencies identified do not necessarily mean that equipment is unqualified. However, they are cause for concern and may require further case-by-case evaluation.

4.1 Equipment Requiring Immediate Corrective Action

4.2 Equipment Requiring Additional Information and/or Corrective Action

Appendix B identifies equipment in this category, including a tabulation of deficiencies. The deficiencies are noted by a letter relating to the legend (identified below), indicating that the information provided is not sufficient for the qualification parameter or condition.

Legend

R - radiation
T - temperature
QT - qualification time
RT - required time

P - pressure
H - humidity
CS - chemical spray
A - material-aging evaluation; replacement schedule; ongoing equipment surveillance
S - submergence
M - margin
I - HELB evaluation outside containment not completed
QM - qualification method
RPN - equipment relocation or replacement; adequate schedule not provided
EXN - exempted equipment justification inadequate
SEN - separate-effects qualification justification inadequate
QI - qualification information being developed
RPS - equipment relocation or replacement schedule provided

As noted in Section 4, these deficiencies do not necessarily mean that the equipment is unqualified. However, the deficiencies are cause for concern and require further case-by-case evaluation. The staff has determined that an acceptable basis to exempt equipment from qualification, in whole or part, can be established provided the following can be established and verified by the licensee:

- (1) Equipment does not perform essential safety functions in the harsh environment, and equipment failure in the harsh environment will not impact safety-related functions or mislead an operator.
- (2a) Equipment performs its function before its exposure to the harsh environment, and the adequacy for the time margin provided is adequately justified, and
- (2b) Subsequent failure of the equipment as a result of the harsh environment does not degrade other safety functions or mislead the operator.
- (3) The safety-related function can be accomplished by some other designated equipment that has been adequately qualified and satisfies the single-failure criterion.
- (4) Equipment will not be subjected to a harsh environment as a result of the postulated accident.

The licensee is, therefore, required to supplement the information presented by providing resolutions to the deficiencies identified; these resolutions should include a description of the corrective action, schedules for its completion (as applicable), and so forth. The staff will review the licensee's response, when it is submitted, and discuss the resolution in a supplemental report.

It should be noted that in cases where testing is being conducted, a condition may arise which results in a determination by the licensee that the equipment does not satisfy the qualification test requirements. For that equipment, the licensee will be required to provide the proposed corrective action, on a timely basis, to ensure that qualification can be established by June 30, 1982.

4.3 Equipment Considered Acceptable or Conditionally Acceptable

Based on the staff review of the licensee's submittal, the staff identified the equipment in Appendix C as (1) acceptable on the basis that the qualification program adequately enveloped the specific environmental plant parameters, or (2) conditionally acceptable subject to the satisfactory resolution of the staff concern identified in Section 3.7.

For the equipment identified as conditionally acceptable, the staff determined that the licensee did not clearly

- (1) state that an equipment material evaluation was conducted to ensure that no known materials susceptible to degradation because of aging have been used,
- (2) establish an ongoing program to review the plant surveillance and maintenance records in order to identify equipment degradation which may be age related, and/or
- (3) propose a maintenance program and replacement schedule for equipment identified in item 1 or equipment that is qualified for less than the life of the plant.

The licensee is, therefore, required to supplement the information presented for equipment in this category before full acceptance of this equipment can be established. The staff will review the licensee's response when it is submitted and discuss the resolution in a supplemental report.

5 DEFERRED REQUIREMENTS

IEB 79-01B, Supplement 3 has relaxed the time constraints for the submission of the information associated with cold shutdown equipment and TMI lessons-learned modifications. The staff has required that this information be provided by February 1, 1981. The staff will provide a supplemental safety evaluation addressing these concerns.

APPENDIX B

Equipment Requiring Additional Information
and/or Corrective Action
(Category 4.2)

LEGEND:

Designation for Deficiency

- R - Radiation
- T - Temperature
- QT - Qualification Time
- RT - Required Time
- P - Pressure
- H - Humidity
- CS - Chemical spray
- A - Material aging evaluation, replacement schedule, ongoing equipment surveillance
- S - Submergence
- M - Margin
- I - HELB evaluation outside containment not completed
- QM - Qualification method
- RPN - Equipment relocation or replacement, adequate schedule not provided
- EXN - Exempted equipment justification inadequate
- SEN - Separate effects qualification justification inadequate
- QI - Qualification information being developed
- RPS - Equipment relocation or replacement schedule provided

Equipment Description	Manufacturer	Model No.	Location ¹	Deficiency
Flow Transmitter	Fischer & Porter	10B2496PBBABBB	2	R,QT,A,QM
Pressure Transmitter	Fischer & Porter	50EP1041BCXA	2	R,QT,A,QM
Motor Operator	Limitorque	SMB-00	1	R,CS,A
Motor Operator	Limitorque	SMB-00	2	R,RT,A
Motor Operator	Limitorque	SMB-3	1	R,CS,A
Motor Operator	Limitorque	SMB-1	2	R,RT,A
Pump Motor	Westinghouse	506UPZ	2	R,T,QT,RT,P,H, A,M

¹ Location (1) Containment Building
Location (2) Auxiliary Building

APPENDIX B (cont'd)

Equipment Description	Manufacturer	Model No.	Location ¹	Deficiency
Temperature Element	Rosemount	176KF	1	R,CS,A
Fan Motor	Westinghouse	685.5-S	1	R,CS,A
Electrical Penetration	Crouse-Hinds	1.2.2 (745)	1	R,QT,RT,CS,A
Electrical Penetration	Crouse-Hinds	1.2.2 (747)	1	R,QT,RT,CS,A
Electrical Penetration	Crouse-Hinds	1.2.4 (749)	1	R,QT,RT,CS,A
Electrical Penetration	Crouse-Hinds	1.2.5 (751)	1	R,QT,RT,CS,A
Cable	Continental Wire & Cable	CC2115	1	R,RT,P,H,CS,A
Cable	Kerite	High temp, fire resistant	1	R,RT,P,H,CS,A
Transmitter	Rosemount	1153A	1	R,H,CS,A,QM,S
Solenoid Valve	ASCO	NP831665E	1	R,CS,A
Solenoid Valve	ASCO	NP8316E35E	1	R,CS,A
Solenoid Valve	ASCO	206-381-2U	1	R,CS,A
Cable Splices	Raychem	1000-12N	1	R,T,RT,P,H,CS,A
Cable Splices	Raychem	500-12N	1	R,T,RT,P,H,CS,A
Cable Splices	Raychem	300-12N	1	R,T,RT,P,H,CS,A
Cable Splices	Raychem	200-12N	1	R,T,RT,P,H,CS,A
Cable Splices	Raychem	115-6N	1	R,T,RT,P,H,CS,A
Cable Splices	Raychem	070-6N	1	R,T,RT,P,H,CS,A
Level Transmitter	Fischer & Porter	10B2496	1	QT,RT,CS,A,QM, S,RPS

APPENDIX B (cont'd)

Equipment Description	Manufacturer	Model No.	Location ¹	Deficiency
Pressure Transmitter	Fischer & Porter	50EP1041BCXA-NS	1	CS,A,QM,S,RPS
Flow Transmitter	Rosemount	1151	1	QT,P,CS,A,QM,S,RPS
Level Transmitter	Fischer & Porter	13D2495	1	QT,CS,A,QM,S,RPS
Solenoid Valve	ASCO	LB8211C32	1	R,T,QT,P,H,CS,A,QM,S,RPS
Solenoid Valve	ASCO	LB8316B25	1	R,T,QT,P,H,CS,A,QM,S,RPS
Solenoid Valve	ASCO	LB8316B15	1	R,T,QT,P,H,CS,A,QM,S,RPS
Solenoid Valve	ASCO	LB8316B14	1	R,T,QT,P,H,CS,A,QM,S,RPS
Level Switch	Madison	5602	1	R,T,QT,RT,P,H,CS,A,QM
Level Transmitter	Fischer & Porter	13B2496	1	QT,CS,A,QM,S,RPS
Cable for Instrumentation	Continental Wire & Cable	CC2115	1	R,RT,P,H,CS,A,QI
Silicon Rubber Tape	3M/Electric Products Division	Scotch 70	1	R,T,QT,RT,P,H,CS,A,QM,QI
Cable Terminals and Splices	AMP	53548-1	1	R,T,RT,P,H,CS,A,QM,QI

APPENDIX C

Equipment Considered Acceptable or Conditionally Acceptable
(Category 4.3)

Equipment Description	Manufacturer	Model No.	Deficiency
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No equipment in this category.

APPENDIX D

Safety-Related Systems List¹

Function	System
Emergency Reactor Shutdown	Reactor Protection
	Engineered Safeguards Actuation
	Chemical and Volume Control
	Reactor Coolant
Containment Isolation	Chemical and Volume Control
	Main and Auxiliary Steam
	Main and Auxiliary Feedwater
	Safety Injection
	Residual Heat Removal
	Cooling Water
	Containment Ventilation
Reactor Core Cooling	Safety Injection System
Containment Heat Removal	Containment Spray
	Containment Air Recirculation
Core Residual Heat Removal	Residual Heat Removal
	Auxiliary Feedwater
	Main Feedwater
	Main Steam
	Cooling Water
	Safety Injection

¹The NRC staff recognized that there are differences in nomenclature of systems because of plant vintage and engineering design, consequently, some systems performing identical or similar functions may have different names. In those instances, it was necessary to verify the function of the system(s) with the responsible IE regional reviewer and/or the licensee.

APPENDIX D (continued)

Function	System
Prevention of Significant Release of Radioactive Material to Environment	Containment Air Purification ⁽¹⁾
	Containment Combustible Gas Control ⁽¹⁾
	Post Accident Sampling and Monitoring
Supporting Systems	HVAC
	Emergency Power

⁽¹⁾ Covered as part of TMI-2 lessons learned.

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