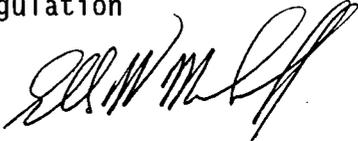




UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W., SUITE 2900
 ATLANTA, GEORGIA 30323-0199
 March 30, 1995

50-261

MEMORANDUM TO: John A. Zwolinski, Deputy Director
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

FROM: Ellis W. Merschoff, Director 
 Division of Reactor Projects

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE (TIA NO. 95-002) -
 EVALUATE H.B. ROBINSON NUCLEAR STATION POSITION
 PERTAINING TO TECHNICAL SPECIFICATION COMPLIANCE AND
 OPERABILITY OF CVCS SYSTEM

Please find enclosed the licensee's position pertaining to recent resident inspector findings that appear to indicate that the plant may have routinely operated in violation of their Technical Specifications for a number of years.

The issue centers on the licensee's interpretation of Technical Specification 3.2, Chemical and Volume Control System, which requires, in part, that the reactor not be made critical unless two charging pumps are operable. The licensee's definition of "operable" as delineated in Definition 1.3, states, "A system, subsystem, train, component or device shall be operable or have operability when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its specified function(s) are also capable of performing their related support function(s)."

Robinson has three installed positive displacement charging pumps. The B and C pumps are supplied power from the E1 and E2 onsite, emergency electrical power sources. The A charging pump is not fed from an emergency electrical power source, and as such does not appear to meet the definition of an "operable" charging pump.

The licensee routinely removes either B or C charging pumps from service for maintenance and or surveillance. Heretofore the licensee has regarded the A charging pump as a fully "operable" replacement for the pump removed from service.

Please review the licensing and design basis for the CVCS system to ascertain the validity of the licensee's position.

9505010167 950330
 PDR ADDCK 0500261
 P PDR

Memo 4
 DF01
 111

J. Zwolinski

2

If we can be of further assistance, please contact H. Christensen at (404) 331-5533, or W. Orders at (803) 383-4571.

Docket No.: 50-261
License No.: DPR-21

cc w/att: DRP Director, RI
 DRP Director, RIII
 DRP Director, RIV
 K. Perkins, WCFO
 S. Vias, RII

CVCS System Operation And Technical Specification Compliance

Robinson Technical Specification 3.2, Chemical and Volume Control System, requires in part, that the reactor not be made critical unless two charging pumps are operable. The licensee's definition of "operable" as delineated in Definition 1.3, states, "A system, subsystem, train, component or device shall be operable or have operability when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its specified function(s) are also capable of performing their related support function(s)."

Robinson has three installed positive displacement charging pumps. The B and C pumps are supplied power from the E1 and E2 onsite, emergency electrical power sources. The A charging pump is not fed from an emergency electrical power source, and as such does not appear to meet the definition of an "operable" charging pump.

The licensee routinely removes either B or C charging pumps from service for routine maintenance/surveillance and heretofore has regarded the A charging pump as a fully "operable" replacement for the pump removed from service.

On January 15, 1995, the licensee removed the C charging pump from service due to a crack in a drain line off the pump suction stabilizer. The licensee considered the A and B charging pumps to be operable and considered themselves to be in compliance with TS 3.2 which requires two charging pumps to be operable if the reactor is critical.

At 1:13 p.m. on the afternoon of January 17, 1995, the A charging pump high speed alarm was received which the licensee subsequently determined was due to the rapid degradation of the pump's packing. The licensee was forced to remove the A pump from service. The B charging pump was placed in service and the licensee entered the 24 hour TS action statement which is applicable when only one charging pump is operable. As a precautionary measure, the licensee placed the C charging pump in an "available" lineup, even though the pump had not been repaired.

By 10:45 a.m., the next morning, the licensee had completed maintenance on the A pump, including post maintenance testing. Although the pump was in the Alert range for both flow and vibration, the licensee declared the pump to be operable and exited the 24 hour action statement.

ATTACHMENT

As an adjunct to assessing the event, the inspectors questioned the licensee concerning their interpretation of the requisites of TS 3.2. and the viability of the A charging pump. The licensee's position, as provided to the resident inspectors, is as follows:

"Since HBRSEP was designed such that the 'A' pump was not designed to be powered from the emergency bus, there is no "emergency electrical power source" and therefore, the 'A' pump is operable as long as its normal power source is available. Additionally, since no credit is taken for the charging pumps in the UFSAR Accident Analyses and the pumps are stripped from their respective emergency buses, the emergency power sources for the 'B' and 'C' charging pumps are not required to be operable for the charging pumps to be able to perform their intended function, by definition. The Technical Specification clearly recognizes that the plant design has three charging pumps capable of providing boration. Therefore, the use of any two of the three charging pumps meets TS Sections 3.2.2 and 3.2.3 and is consistent with our plant design and CLB."

The resident inspectors did not agree with the licensee's position and requested a conference call which involved RII and NRR personnel, the resident staff and licensee personnel in order to resolve the issue. Subsequent to the call, it was decided that the issue would be carried as an Unresolved Item pending NRC review of the design and licensing basis for the system. This issue will be tracked as URI 95-03-01, Chemical and Volume Control System Design Basis TIA until the completion of NRR review.

ATTACHMENT