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 ERNST, M.L. Region 2, Ofc of the Director

SUBJECT: Documents licensee request for enforcement discretion per
 881013 telcon between CW Hehl & CS Hinnant re Tech Spec 3.6.

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NOTES: Application for permit renewal filed.

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CP&L

Carolina Power & Light Company

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OCT 13 1988

Mr. Malcolm L. Ernst
Acting Regional Administrator
United States Nuclear Regulatory Commission
Region II
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Atlanta, Georgia 30323

The purpose of this letter is to formally document Carolina Power & Light's (CP&L) request for enforcement discretion as discussed in a telephone conference between C.W. Hehl of your staff and C.S. Hinnant of my staff on October 13, 1988. The request involves Technical Specification 3.6.3 as it applies to valve 1FW-307.

Valve 1FW-307 (shown as valve no. 2FW123-SAB-1 on FSAR Figure 10.1.0-3) is the isolation valve for the bypass line around the Main Feedwater Isolation Valve (MFIV) for the A Steam Generator. Valve 1FW-307 was discovered to have an excessive stroke time during surveillance testing. The valve was declared inoperable per Technical Specification 3.6.3 and was closed and deenergized in accordance with action b of that specification. Investigation of the inoperable valve has determined that the problem is internal to the valve body and not with the actuator. As a result repairs to the valve cannot be made unless the plant is cooled down to Mode 5 and the containment integrity no longer required.

Valve 1FW-307 is a containment isolation valve and it is closed by a Main Feedwater Isolation Signal (MFIS). It is located in a three inch bypass line around the MFIV. The valve is opened only during power escalation for a period of approximately forty-five minutes to warm up the steam generator preheater region with feedwater at relatively low flowrates. After heatup of the feedwater line between the MFIV and the Steam Generator is accomplished, the MFIV is opened and the bypass isolation is closed. This evolution occurs at approximately 20 % power. This evolution cannot be performed on A Steam Generator and remain in compliance with Technical Specification 3.6.3 or its action statements.

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Valve 1FW-307 receives a MFIS because it is in parallel with the MFIV. The MFIS is generated from High High Water Level in a Steam Generator and Safety Injection Signal. The closure of the valve assures that overflow of the Steam Generator is prevented, limits the mass addition to a faulted Steam Generator during a postulated Main Steamline Break, and provides containment integrity along with the closed system of the Steam Generator.

We conclude that it is acceptable to open 1FW-307 for the short amount of time required by the startup evolution because capability continues to exist to automatically and manually isolate the 3 inch bypass line by other means. First, in series with 1FW-307 is a flow control valve. This valve, 1FW-306, is operated from the main control room. It fails closed on loss of power or loss of instrument air, and receives a close signal if high flowrates occur in the three inch line. This valve is used to regulate the warmup flowrate to the preheater. This valve is also a Class 2 valve and is located in close proximity to 1FW-307 in the steam tunnel. Second there is a check valve in the Main Feedwater Line upstream of the bypass line. Third, the Main Feedwater Regulating Valve and the Bypass Regulating Valve also receive a MFIS. The redundancy provided by these valves provides assurance that feedwater can be isolated and that containment integrity can be established.

CP&L requests the permission to open 1FW-307 for the short period of time required to support normal warmup of the preheater section of the steam generator. This action will be compensated by three actions: (1) stationing of an operator (with direct communication to the Main Control Room) at 1FW-307 to manually close the valve should a MFIS be generated; (2) stationing an operator at the controls in the Main Control Room for 1FW-306 (2FW-F9SN-1 as shown on FSAR Fig 10.1.0-3) to isolate this valve should a MFIS be generated; (3) limiting the valve opening to only that required to complete the evolution required by the General Operating Procedure.

This enforcement discretion is requested to remain in effect until 1FW-307 can be repaired. This valve will be repaired at the next reasonable opportunity.

Very truly yours,

C. S. Hinnant for

R. A. Watson, Vice President
Harris Nuclear Project

cc: Mr. B. C. Buckley (NRC)
W. H. Bradford (HNP)
NRC Resident Office)

Mr. M. L. Ernst
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