CP&L

Carolina Power & Light Company

85 AUG 19 A9:39 ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

AUG 12 1985

Robinson File No: 13510E Serial: RNPD/85-2120

Dr. J. N. Grace
Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W., Suite 3100
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REGION II INSPECTION REPORT 85-22

Dear Dr. Grace:

Carolina Power and Light (CP&L) has received and reviewed the subject report and provides the following response.

A. Severity Level IV Violation (RII-85-22-01-SL4)

Title 10 Code of Federal Regulations, Part 50.55a(g), requires that inservice testing to verify operational readiness of pumps and valves whose function is required for safety be accomplished in accordance with Section XI of the ASME Boiler and Pressure Vessel (B and PV) Code. ASME B and PV Code, Section XI, 1977 edition through Summer 1978 addenda, has been identified as the applicable code for inservice testing. For a pump with a vibration amplitude of .86 mils, Table IWP-3100-2 of ASME B and PV Code, Section XI, specifies the following allowable ranges of test quantities: Acceptable Range - zero to two mils, Alert Range - two to three mils, and Required Action Range - greater than three mils. Paragraph IWP-4120 of the ASME B and PV Code, Section XI, states that "the full-scale range of each instrument shall be three times the reference value or less."

Contrary to the above, inservice testing of pumps and valves was not accomplished in accordance with the ASME B and PV Code, Section XI, in that the following was noted:

A. The allowable ranges of test quantities for the service water pump with a vibration amplitude of 0.86 mils as specified in Carolina Power and Light Procedure OST-302, Revision 8, were: Acceptable Range - less than or equal to five mils, Alert Range - greater than five mils but less than six mils, and Required Action Range - equal to or greater than six mils.

1/0 IE01

B. Seven gauges used in CP&L Procedure Nos. OST-251, OST-403, and OST-908 had range to pressure ratios of 3.85 to 8.85.

RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason for the Violation

A. The violation occurred because a different interpretation of the ASME Section XI IWP-3100-2 code requirements was implemented at the Robinson Nuclear Project (RNP). The allowable ranges for vibration of the service water pumps were established in accordance with IWP-3100-2. However, the allowable ranges were derived by averaging the base line data for the four service water pumps. This resulted in using the same allowable ranges for vibration for the four service water pumps. This interpretation of IWP-3100-2 was applied to all sets of pumps in the ASME Section XI Inservice Testing (IST) Program.

B. The proper range of pressure gauges for the IST Program is contained in the respective instrument's calibration sheets. However, a recent survey by CP&L of the IST pressure gauges at the RNP identified three areas (7 gauges) that did not meet the full intent of the code.

1. The two diesel fuel oil discharge pressure gauges need to be replaced and the calibration sheet changed to reflect the new gauges.

2. The ranges of the three component cooling water pump suction pressure gauges were based on the setpoint of a relief valve that is rendered inoperable due to a design change. The gauges need to be replaced and the calibration sheet revised.

3. The ranges of the two residual heat removal discharge pressure gauges are higher than code requirements due to the system design. An exemption request to the code requirement needs to be submitted on these two gauges.

3. Corrective Steps Which Have Been Taken

A. Carolina Power and Light (CP&L) has reviewed the ASME Section XI code requirements and agrees that the allowable ranges for vibrations should be specific to each pump.

B. The two diesel fuel oil pump discharge pressure gauges and the three CCW pump suction pressure gauges have been replaced with the appropriate gauges. The calibration sheets will be changed to reflect these changes in gauges.

4. Corrective Steps Which Will Be Taken

A. The IST Program will be revised to ensure the allowable ranges for vibration will be specific for each pump.

B. An exemption request from code requirements will be submitted on the two RHR discharge pressure gauges. In the interim, the accuracy of these two gauges has been verified to be more restrictive to off-set the ranges being greater than code requirement. The violation on gauge ranges resulted from the inspectors review of a recent survey conducted by CP&L to identify problems with pressure gauges. Therefore, except for the procedure revision on the CCW and diesel fuel oil transfer pump gauges and the submittal of the exemption request on the RHR gauges, no further action is necessary.

5. Date When Full Compliance Will Be Achieved

A. Changes to procedures to ensure the allowable ranges for vibration is specific for each pump is scheduled to be completed by October 15, 1985.

B. The exemption request on the RHR discharge pressure gauges is scheduled to be submitted to the NRC by October 15, 1985. The procedure changes on the CCW and diesel fuel oil transfer pump gauges is scheduled to be completed by October 30, 1985.

If you have any questions concerning this response, please contact Mr. David C. Stadler at (803) 383-4524, Extension 2363.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson S. E. Plant

CLW:esp