



Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

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H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

February 5, 1982

Robinson File No: 13510E

Serial: RSEP/82-165

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO I.E. INSPECTION REPORT NO. 81-35

Dear Mr. O'Reilly:

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

Violation - Severity Level VI (IER-81-35-01)

10 CFR 50.55a(g) requires that inservice inspection of Class 1, 2, and 3 piping systems be conducted in accordance with ASME B&PV Code Section XI. ASME Section XI requires that boundaries of Class 1, 2, and 3 systems be established in accordance with Regulatory Guide 1.26.

Contrary to the above, establishing of piping class boundaries in accordance with Regulatory Guide 1.26 was not done in that the feedwater piping system inspection isometrics show a check valve as the Class 2/Class 3 boundary when in fact the boundary valve is a motor operated isolation valve upstream of the check valve.

1. Admission or Denial of Alleged Violation

Carolina Power and Light Company acknowledges the violation. To clarify the violation, the first 10 year In-Service Inspection (ISI) Program established a Class 2/No Class boundary in the feedwater system. The Class 2/Class 3 boundary for the feedwater system was established in the second 10 year ISI Program.

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2. Reason For The Violation

The Inservice Inspection (ISI) Program is established on 10 year intervals. It includes the "Pump and Valve Test" Program and the "Component Inspection" Program.

The error on the establishment of the proper Class 2 boundary for the feedwater system resulted from a discrepancy in the October 25, 1978 letter submitted to NRR which revised the first 10 year ISI Program. Specifically:

The October 25, 1978 submittal committed both the "Pump and Valve Test" and "Components Inspection" to the 1974 edition of ASME Section XI which included Class 2 and Class 3 boundaries in addition to the previously established Class 1 boundaries. In accordance with Regulatory Guide 1.26, Revision 2, Class 2 was established from the steam generator to the outermost containment isolation valve which then was determined to be the FWRV block and bypass valves because they were capable of automatically closing during all modes of normal reactor operation. A Q-List drawing of the feedwater system (referenced in the Inspection Report) was included in the "Pump and Valve Test" Program. This drawing was marked in color to show Class 2 from and including the steam generator to the FWRV block and bypass valves. However, the "Component Inspection" Program which included feedwater system isometric sketches CPL-215, 216, and 217 (referenced in the Inspection Report) showed Class 2 as that feedwater piping from and including the steam generator up to and including the stop check valve upstream of the steam generator. The piping between the stop check valve and the FWRV block and bypass valve was not classified. This was in error with the established first 10 year interval ISI class boundaries.

The March 10, 1981 submittal to the NRR on the second 10 year interval committed the "Pump and Valve Test" Program to the 1977 edition of ASME Section XI. The class boundaries were based on Regulatory Guide 1.26, Revision 2, along with ANSI N18.2, 1973 and ANSI N18.2a, 1975. ANSI N18.2a, 1975 stated that a containment isolation valve may include a check valve. Therefore, Class 2 was re-established as that feedwater piping from and including the steam generator up to and including the stop check valves upstream of the steam generator. The feedwater system between the stop check valve and the FWRV block and bypass valves were classified as Class 3.

It is CP&L's position that the March 10, 1981 submittal to NRR correctly establishes the Class 2/Class 3 boundary for the feedwater system ISI program. The "Component Inspection" section of the ISI Program is in error in that although it properly identifies Class 2 boundary, it does not properly classify the feedwater system between the stop check valve and the FWRV block and bypass valves as Class 3.

Letter to Mr. James P. O'Reilly
Serial: RSEP/82-165
Page 3

3. Corrective Steps Which Have Been Taken

A Class 3 "Components Inspection" on the feedwater system between the stop check valve upstream of the steam generator and the FWRV block and bypass valve (including connecting piping) has been identified as needing to be performed and has been scheduled during the next refueling outage.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

The "Components Inspection" Program is presently under review for completeness. In a December 31, 1981 letter to NRR, CP&L committed to submit the second 10 year interval "Components Inspection" Program by March 1, 1982. The review for this submittal will ensure that the "Components Inspection" class boundaries are consistent with the "Pump and Valve Test" class boundaries.

5. Date When Full Compliance Will Be Achieved

The above mentioned Class 3 "Components Inspection" on the feedwater piping will be performed during the next refueling outage.

The above information is true and accurate to the best of my knowledge.

If you have any questions concerning this response, please contact me.

Very truly yours,



R. B. Starkey, Jr.
General Manager

H. B. Robinson S.E. Plant

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