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SUBJECT: Disputes violation noted in Insp Rept 50-261/91-201.
 Violation did not meet threshold criteria for initiation of
 Adverse Condition Rept. Lists actions taken to evaluate
 effects of galled stem.

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Robinson File No.: 13510E

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT
UNIT NO. 2

DOCKET NO. 509-261

LICENSE NO. DPR-23

NRC INSPECTION REPORT NO. 50-261/91-201 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in Inspection Report 50-261/91-201.

Severity Level IV Violation (RII-91-201-VIO)

10 CFR 50 Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and action taken to preclude repetition.

Contrary to the above, conditions that questioned the operability of a motor operated valve were not properly identified or evaluated to determine equipment operability and the appropriate corrective action. An Adverse Condition Report (the Licensee's document for identifying discrepant conditions) was not issued for severe valve stem galling identified on April 15, 1991, on main feedwater isolation valve V2-6A. Although this deficiency was documented on a work request, no engineering evaluation or operability determination was performed on this valve. In addition, corrective action taken in response to a previous violation relating to this valve appeared to be inadequate.

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The previous violation (50-261-89/200) documented three instances of thermal overload trips for this valve without proper documentation or evaluation. CP&L acknowledged this violation and their response stated that an "extensive evaluation was performed, including actuator sizing..." During this recent inspection, as a result of operability questions resulting from the valve stem galling, the NRC performed calculations which indicated the motor operator for the V2-6A valve is undersized for valve opening.

REPLY

CP&L does not agree with the violation.

Basis for Disputing the Violation

As stated in the Notice of Violation, stem galling was observed on valve V2-6A on April 15, 1991. This condition did not meet the threshold criteria for initiation of an Adverse Condition Report (ACR) as specified in the plants' Corrective Action Program (CAP), and continued operability of the valve was not questioned by the Shift Supervisor. It did, however, meet the criteria for a CAP Subprogram. For this reason, the operating crew initiated a Work Request instead of an Adverse Condition Report to document the condition and to initiate repairs. Thus, no Operability Determination was called for. However, the following actions were taken to evaluate the effects of the galled stem.

1. Operating shift personnel determined that the existing condition did not warrant an operability determination at the time the stem galling was observed.
2. On the next day shift (April 16), the Site Work Activities Control Group (SWACG) listing was revised, adding V2-6A as an item under evaluation by Technical Support. This process brought the item to the attention of Plant management, including the on-call manager. Visual inspection of the condition was performed by Technical Support personnel.
3. On April 23, Corporate Fuels personnel were contacted to determine the significance of a hypothetical failure of V2-6A to close. From conversation on redundancy of the feedwater block valves acting in concert with feedwater regulating valves, and given the extent of the stem galling, the condition of V2-6A was determined on the basis of engineering judgement not to be an operability issue.

4. On May 15, 1991, the V2-6A stem was polished with a fine emery cloth, reducing the extent of the galled condition. The straightness of the packing follower was checked, and found to be satisfactory. Based on the lack of any information indicating valve inoperability, and the existence of previous test data obtained under static conditions which demonstrated that the valve would have sufficient thrust capability to operate under opening conditions, the previous considerations on operability were again confirmed.

On August 16, 1991, the plant was taken to hot shutdown conditions for unrelated reasons. This provided an opportunity to cycle the valve to assure that previous considerations for valve operability were in fact correct. The valve was closed satisfactorily within a time of 62 seconds. Motor currents measured during two valves cycles compared favorably with the January 5, 1991 baseline testing data.

With regard to the sizing of the motor operator for V2-6A, CP&L's position has been previously stated in response to inspection report 91-201. This response stated that the active safety function of the valve is to close on receipt of a Safety Injection (SI) signal, and the valve does not have a safety function to open during any analyzed accident scenario. However, because of the closing function requirements, the valve is considered a part of the Generic Letter 89-10 program, and the capability for the MOV to function in the opening direction was evaluated. Based on the results of this evaluation, the valve is in fact adequately sized to function in the opening direction.

The original opening differential pressure calculation used the maximum credible upstream line pressure (1525 psig) while assuming a downstream pressure of zero psig. It is this conservatism that resulted in the calculation that indicated the apparent undersizing of the actuator. Because valve opening is not a safety related operation, this condition/calculation was determined to have no affect on valve operability. Therefore, no steps to determine the actual opening differential pressure were made and the opening calculation was not revisited at that time.

In response to the June, 1991 audit finding concerning this issue, a calculation using expected opening differential pressures was performed. Based on the results of this calculation, the valve is in fact adequately sized to function in the opening direction.

Based on the above, CP&L request that the Notice of Violation identified for Inspection Report 91-201 dated October 4, 1991 be withdrawn.

Letter to U.S. Nuclear Regulatory Commission
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Should you have any questions regarding this matter, please contact
Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



Charles R. Dietz
Vice President
Robinson Nuclear Project Department

RDC:sgk

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO