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SUBJECT: Responds to Generic Ltr 90-06 re pressurizer PORVs & NRC
 position resulting from resolution of Generic Issue 70,
 "PORV & Block Valve Reliability" & Generic Issue 94, "Addl
 Low Temp Overpressure Protection for LWRs."

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G. E. VAUGHN
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
RESPONSE TO NRC GENERIC LETTER 90-06

Gentlemen:

Carolina Power & Light Company hereby submits the response to NRC Generic Letter 90-06, dated June 25, 1990, concerning Pressurizer Power Operated Relief Valves (PORVs) for the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2). The Generic Letter presents the NRC staff positions resulting from the resolution of Generic Issue 70, "Power Operated Relief Valve Block Valve Reliability," and Generic Issue 94, "Additional Low Temperature Overpressure Protection for Light Water Reactors." The Generic Letter required that licensees advise the NRC staff under oath and affirmation, within 180 days of the date of the Generic Letter, of current plans relating to PORVs and block valves and to low temperature overpressure protection. The attached information provides specific responses to each of the staff's positions.

Please refer any questions regarding this submittal to Mr. John Eads at (919) 546-4165.

Yours very truly,

G. E. Vaughn

Enclosure

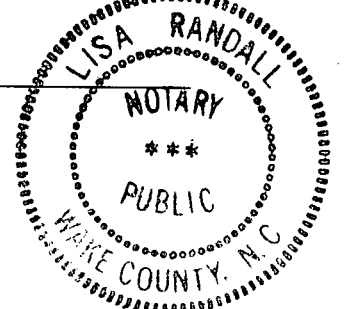
JHE/cwh (929HNP)

G. E. Vaughn, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Notary (Seal)

My commission expires: 6-7-93

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo



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STAFF POSITION 1. SECTION 3.1

Include PORVs and block valves within the scope of an operational quality assurance program that is in compliance with 10 CFR Part 50, Appendix B. This program should include the following elements:

- A. The addition of PORVs and block valves to the plant operational Quality Assurance List.
- B. Implementation of a maintenance/refurbishment program for PORVs and block valves that is based on the manufacturer's recommendations or guidelines and is implemented by trained plant maintenance personnel.
- C. When replacement parts and spares, as well as complete components, are required for existing non-safety-grade PORVs and block valves (and associated control systems), it is the intent of this generic letter that these items may be procured in accordance with the original construction codes and standards.

HBR2 RESPONSE:

Prior to achieving criticality during restart from the next refueling outage, currently scheduled for completion in June, 1992, the pressurizer PORVs and block valves will be included within the scope of an operational quality assurance program that is in compliance with 10 CFR Part 50, Appendix B. This program will include the following elements:

- A. The PORVs and block valves will be added to the plant operational Quality Assurance List, but will remain non-safety-related.
- B. The maintenance/refurbishment program for PORVs and block valves will be based on manufacturer's recommendation or guidelines and will be implemented by trained maintenance personnel.
- C. When replacement parts and spares are required for existing non-safety-related PORVs and block valves, these items will be procured in accordance with the original construction codes and standards.

STAFF POSITION 2. SECTION 3.1

Include PORVs, valves in PORV control air systems, and block valves within the scope of a program covered by subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants," of Section XI of the ASME Boiler and Pressure Vessel Code. Stroke testing of PORVs should only be performed during Mode 3 (HOT STANDBY) or Mode 4 (HOT SHUTDOWN) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. Stroke testing of the PORVs should not be performed during power operation. Additionally, the PORV block valves should be included in the licensees' expanded MOV test program discussed in NRC Generic Letter 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance," dated June 28, 1989.

HBR2 Response:

The PORVs, and block valves will be included within the scope of the HBR2 ASME Section XI Inservice Testing Program. The PORV pneumatic air supply valves will be verified as operable by successful completion of PORV inservice testing. Program revisions will be completed prior to achieving criticality during restart from the next refueling outage, currently scheduled for completion in June, 1992. Stroke testing of the PORVs will be performed during HOT SHUTDOWN (when reactor is subcritical and T avg is greater than 200°F) with the associated block valves shut and prior to establishing conditions where the PORVs are used for low temperature overpressure protection. Additionally, the PORV block valves are currently included in the MOV Test Program discussed in Generic Letter 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance".

STAFF POSITION 3. SECTION 3.1

For operating PWR plants, modify the limiting conditions of operation of PORVs and block valves in the technical specifications for Modes 1, 2, and 3 to incorporate the position adopted by the staff in recent licensing actions. Attachments A-1 through A-3 are provided for guidance. The staff recognizes that some recently licensed PWR plants already have technical specifications in accordance with the staff position. Such plants are already in compliance with this position and need merely state that in their response. These recent technical specifications require that plants that run with the block valves closed (e.g., due to leaking PORVs) maintain electrical power to the block valves so they can be readily opened from the control room upon demand. Additionally, plant operations in Modes 1, 2, and 3 with PORVs and block valves inoperable for reasons other than seat leakage is not permitted for periods of more than 72 hours.

HBR2 RESPONSE:

Prior to achieving criticality during restart from the next refueling outage, currently scheduled for completion in June, 1992, CP&L will submit a Technical Specification change request adding limiting conditions of operations (LCO) for the PORVs and block valves whenever the reactor is critical, which will meet the intent of the staff position. The HBR2 Technical Specifications are a custom format and do not follow the format contained in the Generic Letter. The new LCO will require that when the block valves are closed due to excessive PORV seat leakage, that electrical power to the block valves will be maintained so that they may be readily opened from the control room upon demand. Additionally, plant operations with the reactor critical will not be permitted for periods of more than 72 hours with PORVs and block valves inoperable for reasons other than seat leakage. In addition to the new LCOs, appropriate plant specific surveillance requirements and bases will be added consistent with existing HBR2 Technical Specifications.

STAFF POSITION ENCLOSURE B, SECTION 3

The staff concludes that the LTOP system performs a safety-related function and inoperable LTOP equipment should be restored to an operable status in a shorter period of time. The current 7-day AOT for a single channel is considered to be too long under certain conditions. The staff has concluded that the AOT for a single channel should be reduced to 24 hours when operating in MODE 5 or 6 when the potential for an overpressure transient is highest. The operating reactor experiences indicate that these events occur during planned heatup (restart of an idle reactor coolant pump) or as a result of maintenance and testing errors while in MODE 5. The reduced AOT for a single channel in MODES 5 and 6 will help to emphasize the importance of the LTOP system in mitigating overpressure transients and provide additional assurance that plant operation is consistent with the design basis transient analyses.

Based on the foregoing concerns, added assurance of LTOP availability is to be provided by revising the current Technical Specifications for Overpressure Protection to reduce the AOT for a single channel from 7-days to 24 hours when the plants is operating in MODES 5 or 6. Attachment B-1 is provided for guidance for Westinghouse and CE plants. The guidance provided is also applicable to plants that rely on both PORVs and RHR SRVs or that rely on RHR SRVs only. Attachment B-2 provides that staff bases for Overpressure Protection Technical Specification.

HBR2 RESPONSE:

Prior to achieving criticality during restart from the next refueling outage, currently scheduled for completion in June, 1992, CP&L will submit a Technical Specification change request modifying the allowed outage time (AOT) for a single channel of LTOP equipment from 7 days to 30 hours whenever the RCS temperature is below 350°F and not vented to the containment. The 30 hour AOT is consistent with other similar HBR2 custom Technical Specifications and meets the intent of the NRC position.