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SUBJECT: Advises of implementation of Staff Positions 1 & 2 of Encl A
 to Generic Ltr 90-06, "Resolution of Generic Issue 70, 'PORV
 & Block Valve Reliability' & Generic Issue 94, 'Addl Low
 Temp Overpressure Protection for LWRs.'"

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SERIAL: NLS-92-164

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
IMPLEMENTATION OF GENERIC LETTER 90-06 STAFF POSITIONS
(TAC NO. M77446)

Gentlemen:

The purpose of this letter is to notify the NRC, as requested by your letter of April 3, 1991, that Carolina Power & Light Company's (CP&L) has implemented Staff Positions 1 and 2 of Section 3.1 of Enclosure A to Generic Letter 90-06 at the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). The subject of Generic Letter 90-06 was "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,'" and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light Water Reactors,' Pursuant to 10CFR50.54(f)."

The H. B. Robinson Plant has implemented Staff Positions 1 and 2 as discussed in our letter dated December 21, 1990 (Serial No. NLS-90-257). The following is a summary of our method of implementation of Staff Positions 1 and 2.

STAFF POSITION 1

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

- A. The addition of PORVs and block valves to the plant operational QA 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 nonsafety 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.

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HBR2 RESPONSE STATUS

The H. B. Robinson Plant has implemented Staff Position 1 prior to criticality during restart from Refueling Outage No. 14 in the following manner:

- A. The PORVs and block valves have been added to the plant QA List, TMM-003, at Section 4.0, item r. (1).
- B. PLP-038, "Technical Manual/Vendor Recommendation Review Program," describes the methods HBR2 uses for assuring manufacturers' recommendations are made available for inclusion as appropriate in plant programs. Various maintenance procedures require the Manager - Maintenance to provide trained personnel to conduct all corrective and preventive maintenance. Progression through the CP&L's Craft and Technical Development Training and Qualification Program assures trained maintenance personnel.
- C. Procedure PE-001, "Procurement of Items," has been revised to incorporate this position.

STAFF POSITION 2

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 licensee's expanded Motor-Operated Valve (MOV) test program discussed in NRC Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," dated June 28, 1989.

HBR2 RESPONSE STATUS

The PORVs and block valves have been included in the Third Ten-Year Interval Inservice Testing Program. The Third Interval began on February 19, 1992 and is documented in the Plant Operating Manual as procedure TMM-004, "Inservice Inspection Testing." The plant's PORV block valves are included in the MOV test program as documented in the Plant Operating Manual as procedure TMM-032, "Motor-Operated Valve Program."

Should you have any questions regarding this submittal, please refer them to Mr. R. W. Prunty at (919) 546-4165.

Yours very truly,



David C. McCarthy
Manager

Nuclear Licensing Section

RES/jbw

cc: Mr. S. D. Ebnetter
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