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 MCCARTHY, D.C. Carolina Power & Light Co.
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SUBJECT: Suppls 901221 & 920709 responses to GL 90-06, "Resolution of
 GI 70, 'PORV & Block Valve Reliability' & GI 94, 'Addl Low
 Temp Overpressure Protection of Light Water Reactors.'"
 PORVs tested using nitrogen supply to PORV actuators.

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 TITLE: Generic Ltr 90-06 Resolution of GE 70N94 PORVs & Block Valve Reliability

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ATTENTION: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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SUPPLEMENTAL REPLY TO GENERIC LETTER 90-06, "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 10 CFR 50.54(f)"
(TAC NOS. M77373 and M77446)

Gentlemen:

Your letter dated December 2, 1992 provided the results of the NRC staff's review of our submittals dated December 21, 1990 and July 9, 1992, which were provided in response to Generic Letter 90-06. The staff's review of these submittals questioned Carolina Power & Light Company's (CP&L) compliance with certain requirements of the Generic Letter, and requested that CP&L provide an additional submittal within 60 days. The purpose of this submittal is to specifically respond to the staff's area of concern as identified within your letter of December 2, 1992, and to verify that CP&L is in compliance with the requirements of Generic Letter 90-06.

The staff position requires that valves in the power-operated relief valves' (PORV) control air systems be included within the scope of a program covered by Subsection IWV, "Inservice Testing (IST) of Valves in Nuclear Power Plants," of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). The staff stated that our submittals did not adequately meet this staff position, and specifically took exception to our position that successful completion of PORV stroke testing indirectly verifies operability of control air valves. The staff also requested a discussion regarding how we intend to verify the capability of valves in the safety back-up supply for the PORVs. As further stated within the staff's review, the intent of this testing is to assure the capability of the safety back-up supply, and that testing should also be performed for check valves which isolate the safety back-up accumulator supply in the event of a loss of normal air supply.

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In reply to the staff's concerns, we would note that the control valves in the nitrogen supply to the PORV actuators (safety back-up supply) were included in the Third Ten-Year Interval Inservice Testing Program. Testing of the PORVs is performed using the nitrogen supply to the PORV actuators, and individual testing is performed for check valves in the nitrogen supply system that provides separation between this system and the normal air supply system. In addition, as required by the Generic Letter, a timing test of the PORVs is performed at hot shutdown prior to placing the Low-Temperature Overpressure Protection (LTOPP) system in service. These tests are performed in accordance with existing, approved plant procedures and are believed to adequately satisfy the testing requirements associated with Generic Letter 90-06.

Should you have any questions regarding this matter, please contact Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,



David C. McCarthy
Manager

Nuclear Licensing Section

RES/adl

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
Ms. B. L. Mozafari