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SUBJECT: Revises 890403 response to NRC Bulletin 88-010,
"Nonconforming Molded-Case Circuit Breakers (MCCB)." Addl
info re MCCB traceability & applicability of bulletin
requirements to addl MCCBs encl.

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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
REVISED RESPONSE TO NRC BULLETIN NO. 88-10,
"NONCONFORMING MOLDED-CASE CIRCUIT BREAKERS"

Gentlemen:

The purpose of this letter is to revise Carolina Power & Light Company's (CP&L) response to NRC Bulletin No. 88-10, "Nonconforming Molded-Case Circuit Breakers," for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) dated April 3, 1989. The Bulletin requested that licensees take actions to provide reasonable assurance that molded-case circuit breakers (MCCBs) purchased for use in safety-related applications, without verifiable traceability to the circuit breaker manufacturer (CBM), perform their safety functions. Supplement 1 to the Bulletin was issued August 3, 1989 and provided specific examples of common deficiencies identified by the NRC in preliminary review of responses to the Bulletin. The Supplement requested licensees to review individual written reports submitted to the NRC in accordance with the Bulletin, and verify that their responses meet the Bulletin provisions as clarified by the Supplement.

CP&L verified that the original response meet the Bulletin provisions as clarified by the Supplement and determined that changes to the HBR2 response to the Bulletin were not warranted as a result of issuance of the Supplement. However, CP&L hereby submits a revised response to the original Bulletin, which provides additional information concerning safety-related MCCBs at HBR2. This information has been identified subsequent to CP&L's original response to the Bulletin. This revision changes from two to four the number of safety-related MCCBs which were reported as not replaced during Refueling Outage 12 at HBR2. Additional information regarding MCCB traceability and applicability of Bulletin requirements to these additional MCCBs is also provided in the enclosure.

In conclusion, CP&L verifies that all of the safety-related MCCBs at HBR2 meet safety-related requirements and are traceable to the CBM.

9203170317 920310
LDR ADJCK 05000241
Q PDR

(1485RNP)

Questions regarding this matter may be referred to Mr. R. W. Prunty at
(919) 546-7318.

Yours very truly,



G. E. Vaughn

RES/dsm

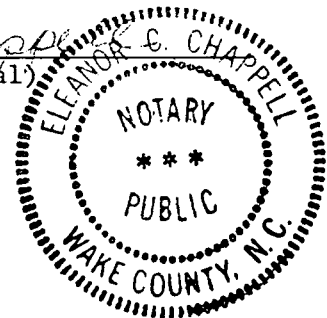
Enclosure

cc: Mr. S. D. Ebnetter
Mr. L. Garner
Mr. R. Lo

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.

My commission expires: 2/6/96

Eleanor C. Chappell
Notary (Seal)



The following revised response incorporates this correction into our April 3, 1989 response to NRC Bulletin No. 88-10 for HBR2. This revised response replaces in its entirety the information previously submitted to the NRC regarding this issue. For ease of review, vertical bars have been placed in the margin to indicate the revised portions of the response.

Revised Response

The applicability to HBR2 of the actions requested and the reporting requirements of NRC Bulletin No. 88-10 are described below.

The Bulletin was issued on November 22, 1988, 10 days following the start of HBR2 Refueling Outage 12. At the time the Bulletin was issued, HBR2 had an ongoing program to change out MCCBs for reasons other than those contained in the Bulletin. By the completion of Refueling Outage 12 on February 25, 1989, all but four of the MCCBs located in safety-related Motor Control Centers 5, 6, 9, 10 (which contain the MCCBs addressed as potential concerns in the Bulletin) had been replaced with more reliable models. These new type MCCBs and spares for stock were supplied to HBR2 under a 10CFR50, Appendix B QA program as safety-related components, or under a safety-related program which included the testing and documentation to provide assurance that the MCCBs meet safety-related requirements and are traceable to the CBM.

Three of the four remaining MCCBs, associated with HVH-5B, HVE-2A, and HVE-2B, are original equipment installation, procured during construction from Westinghouse, and therefore are not applicable to the requirements of the Bulletin. The fourth MCCB, associated with HVH-5A, was replaced on December 26, 1988 with a Q-list, off-the-shelf MCCB. Due to the previous concern of traceability to the CBM and to its safety-related qualification, CP&L committed to replace the HVH-5A MCCB. The HVH-5A MCCB was subsequently replaced during Refueling Outage 13 (fall 1990) with an MCCB ordered under a 10CFR50, Appendix B QA program. Westinghouse Corporation has since performed a traceability search verifying that the CBM for the HVH-5A MCCB, installed in 1988, was a Westinghouse division.

The circuit breakers removed from the safety-related applications at HBR2 were placed in Plant stock for use in nonsafety-related applications only. MCCB spares in stock for future use in safety-related applications were procured via the same CP&L purchase orders and at the same time as those procured as replacements for Motor Control Centers 5, 6, 9, and 10 addressed above. Therefore, the MCCBs applicable to NRC Bulletin No. 88-10 in safety-related applications, and spares for future use, have been verified to be traceable to the CBM.

HBR2 is maintaining a file of information obtained in the review process for a period of five years, per the requirements of Action Item No. 6 of the Bulletin.

For MCCBs purchased after August 1, 1988, CP&L is complying with the requirements of Action Item No. 7 of the Bulletin. HBR2 has initiated additional procurement controls to assure that future MCCBs are either procured via a 10CFR50, Appendix B QA program, or include procurement requirements to provide documentation which establishes traceability to the CBM.