

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
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SUBJECT: Appeals NRC 870211 request that util backfit new procedure to disassemble, inspect & refurbish safety valves following actuation because valves may experience damage due to chattering. Util administrative controls & regulations encl.

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Carolina Power & Light Company

MAR 17 1987

SERIAL: NLS-87-053  
10CFR50.109

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  
APPEAL OF BACKFIT REQUIREMENT

Gentlemen:

Carolina Power & Light Company (CP&L), pursuant to the provision of 10CFR50.109, hereby appeals to reclassify as a backfit an NRC staff request received in a letter dated February 11, 1987. The purpose of the letter was to transmit to CP&L the Safety Evaluation Report (SER) for H. B. Robinson Steam Electric Plant, Unit No. 2, on NUREG-0737, Item II.D.1, *Performance Testing of Relief and Safety Valves*. The SER concluded that CP&L meets the requirements of NUREG-0737, Item II.D.1; however, approval is contingent upon CP&L making a commitment to a new plant procedure which falls outside the scope of NUREG-0737, Item II.D.1. Therefore, CP&L believes that the staff request constitutes a backfit as defined in 10CFR50.109(a)(1).

The objective of NUREG-0737, Item II.D.1, is to demonstrate that the reactor coolant system relief and safety valves are capable of performing their intended function under expected operating conditions for design basis transients and accidents. Carolina Power & Light Company demonstrated this operability requirement through participation in an EPRI test program for performance testing of PWR safety and relief valves. The test program results and CP&L's evaluation of the applicability of the test results to H. B. Robinson Plant demonstrated that the safety valves meet the NRC requirements specified in NUREG-0737, Item II.D.1. The staff indicated in the letter that they conclude that there is reasonable assurance that the relief and safety valves installed on the primary coolant system at H. B. Robinson Plant, Unit No. 2, will perform their design functions under accident conditions.

However, the staff has determined that CP&L should have a procedure in place to disassemble, inspect, and refurbish the safety valves following their actuation because the test program showed that, following a lift, the valves may experience damage due to chattering. Because of the settings of these valves, they are only expected to actuate in the event of a design basis transient or accident. Since NUREG-0737, Item II.D.1, was not intended to prescribe actions following an event, CP&L concludes that the staff request constitutes a change beyond the licensing basis of the plant and thus constitutes a backfit as defined in 10CFR50.109(a)(1).

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Carolina Power & Light Company shares the staff concern that following such an event the valves could experience some damage. However, CP&L does not believe that a backfit consisting of a new plant procedure is necessary because existing plant procedures, administrative controls, and regulations discussed in Attachment 1 would call for an evaluation of the valves should such a transient occur. The attachment to this letter describes these controls. Carolina Power & Light Company is concerned that a new procedure would impose a new and redundant burden on the plant operators.

Carolina Power & Light Company looks forward to a prompt notification on the plan for resolving this appeal to reclassify the request as a backfit.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 836-7318.

Yours very truly,



S. R. Zimmerman

Manager

Nuclear Licensing Section

JSK/ccj (5148JSK)

Attachment

cc: Dr. J. Nelson Grace (NRC-RII)  
Mr. H. Krug (NRC Resident Inspector - RNP)  
Mr. G. Requa (NRC)

## Attachment 1

The following provisions are currently in effect and will be relied upon to ensure safety valve operability in lieu of a specific procedure for post-operation refurbishment:

### 10 CFR 50

1. Paragraph 50.73(b)(2) requires a clear specific narrative statement of exactly what happened during a reportable event. The report should emphasize how systems, components, and operating personnel performed.
2. Paragraph 50.73(b)(4) requires the licensee to describe any corrective actions planned as a result of a reportable event, including the actions to reduce the probability of similar events occurring in the future.
3. Paragraph 50.73(c) authorizes the NRC to require the licensee to submit specific supplemental information beyond that required by 50.73(b); lifting the SRVs requires a one hour report.

### OPERATING LICENSE NO. DPR-23

1. Operating License Section 3.B requires operation of the facility in accordance with the Technical Specifications. The request for commitment suggests that CP&L would violate the license without formal procedures specifically addressing inspection and testing of the safety valves.
2. Technical Specification paragraph 3.1.1.3.C.1 requires all code safeties to be operable whenever RCS temperature is above 350° or the reactor critical, therefore mandating requirements for power operations.
3. By definition in Technical Specification 1.3, a system or component is not operable unless it is capable of performing its specified function. Should a safety valve become inoperable or fail, it is declared inoperable or out of service.

### PLANT PROCEDURES

- MMM-001 Maintenance shall be scheduled and planned so as not to compromise the safety of the plant. Planning shall include consideration of possible safety consequences of concurrent or sequential maintenance, testing, or operating activities. Where suitable documentation is not available to show that equipment is in conformance with maintenance and inspection requirements, the equipment shall not be returned to service.
- OMM-001 Ensures plant operations are conducted in accordance with the operating license and applicable regulatory requirements.
- PLP-013 Ensures that maintenance activities are planned and executed in compliance with plant Technical Specifications and support optimum safety and dependability. This includes corrective maintenance - the act of repairing systems and components to restore their operational and/or safety functions.