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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S. R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Util maintains that requirement for post-accident operability beyond scope of NUREG-0737, Item II. D. 1 & contests NRC 870409 backfitting denial. Procedure OMM-10 will be revised to address operability of safety valves.

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Carolina Power & Light Company

JUL 14 1987

SERIAL: NLS-87-110
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
BACKFIT REGARDING SAFETY VALVES

Gentlemen:

Your letter dated February 11, 1987 transmitted a safety evaluation regarding NUREG-0737, Item II.D.1 requesting that Carolina Power & Light Company (CP&L) have a procedure in place to inspect and refurbish, if necessary, safety valves after a lift. By letter dated March 17, 1987, we stated that "making a commitment to a new plant procedure falls outside the scope of NUREG-0737, Item II.D.1," and that your request constituted a backfit as defined in 10CFR50.109(a)(1). Your April 9, 1987 letter concluded that the requested action did not constitute a backfit, but also noted that the safety evaluation "may have been too prescriptive" and that the "intent was to offer a resolution acceptable to the staff."

Carolina Power & Light Company still maintains that the requirement for post-accident operability is beyond the scope of NUREG-0737, Item II.D.1 and reserves the right to contest the April 9, 1987 backfitting denial. However, CP&L also believes that it is prudent to ensure operability of the safety valves, and that this operability is assured by measures already in place as described in Attachment 1 to our March 17, 1987 letter. Nevertheless, Procedure OMM-10, Post-Trip/Safeguards Review, will be revised to address this issue. The revision will prohibit unit restart authorization, should the safety valves actuate for their intended function, until the valves are inspected, and, if necessary, refurbished. This action will be accomplished within 30 days after receipt of your acceptance that this action meets the intent of your February 11, 1987 letter.

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

ABC/JSK/pp (5204JSK)

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. K. Eccleston (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)
Director, Regional Operations and Generic Requirements

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