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SUBJECT: Discusses NUREG-0737, Item II. E. 1. 2, "Automatic Bus Transfer Feature of Auxiliary Feedwater Sys Testing of Molded Case Circuit Breakers." Util continues to have reservations re impact of instantaneous trip testing on circuit breaker.

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R. B. RICHEY, Manager
Licensing & Nuclear
Fuel 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
NUREG-0737 ITEM II.E.1.2 AUTOMATIC BUS TRANSFER
FEATURE OF AUXILIARY FEEDWATER SYSTEM
TESTING OF MOLDED CASE CIRCUIT BREAKERS

Gentlemen:

Mr. Kenneth T. Eccleston's letter dated January 6, 1988 transmitted a safety evaluation (SE) regarding an automatic bus transfer feature (ABT) for the Auxiliary Feedwater System (AFWS) being reviewed as an open item under NUREG-0737, Item II.E.1.2. In this and an earlier SE, the staff found "that the potential for transferring faults between redundant load groups through the ABT device can be reduced to an acceptable level if molded case circuit breaker (MCCB) coordination on each load group can be maintained." Periodic testing of the MCCB instantaneous and thermal overload trip elements can provide this assurance.

Carolina Power & Light Company (CP&L) continues to have reservations regarding the impact of instantaneous trip testing on MCCB hardware and the reliability and repeatability of the results achieved. We are, therefore, continuing to explore alternatives, including possible hardware changes that address these reservations. In the interim, however, we believe that a test can be performed that verifies operation of the instantaneous trip. Verification of operation of this trip device along with reliance on trip setpoints established by the manufacturer and testing of the thermal overload device currently being performed should provide reasonable assurance that proper coordination exists such that the single failure criteria is shown to be satisfied for the MCCB protection scheme. The testing method to be used is presently being developed from procedures currently in place at the Shearon Harris Nuclear Power Plant and the guidance contained in NEMA Standard AB2-1984, "Procedure for Field Inspection and Performance Verification of Molded Case Circuit Breakers Used in Commercial and Industrial Application." The necessary procedures will be developed prior to testing.

Testing of the installed MCCB cannot be performed while the plant is operating due to the need to shutdown the associated motor control centers for each safeguard train to remove the breakers to be tested. This testing will therefore be performed while shutdown for Refueling Outage 12, currently scheduled to begin November 12, 1988.

To allow the alternatives addressed above to be explored and to ensure that accurate Technical Specifications (TS) with appropriate acceptance criteria are proposed, thereby minimizing future changes, CP&L will submit the appropriate TS change request within

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60 days following start up from Refueling Outage 12. This schedule would also allow some experience with testing to be gained prior to TS submittal if other alternatives are not pursued.

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

Yours very truly,

R. B. Richey
Manager
Licensing and Nuclear Fuel

JSK/lah (5404JSK)

cc: Dr. J. Nelson Grace
Mr. R. Lo
Mr. L. Garner (NRC - HBR)