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SUBJECT: Responds to Generic Ltr 88-14, "Instrument Air Supply Problems Affecting Safety-Related Equipment."

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Carolina Power & Light Company

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FEB 03 1989

SERIAL: NLS-89-025
10CFR50.54(f)

M. A. McDUFFIE
Senior Vice President
Nuclear Generation

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
RESPONSE TO GENERIC LETTER 88-14
INSTRUMENT AIR SUPPLY PROBLEMS AFFECTING SAFETY-RELATED EQUIPMENT

Gentlemen:

Carolina Power & Light Company (CP&L) hereby responds to requests in NRC Generic Letter 88-14 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). This generic letter requested that CP&L review NUREG-1275, Volume 2, and perform a design and operations verification of the instrument air system. The verification efforts that have been performed in accordance with NRC Generic Letter 88-14 are addressed in the attachment to this letter.

Should you have any questions regarding the information contained herein, please contact Mr. R. W. Prunty at (919) 836-7318.

Yours very truly,

M. A. McDuffie

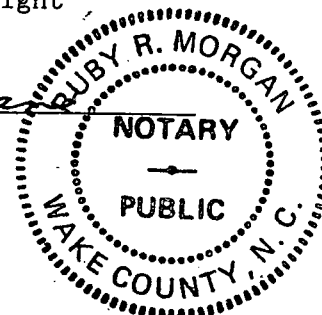
MAM/JCP/crs (192CRS)

cc: Mr. M. L. Ernst
Mr. R. Lo
Mr. L. Garner (NRC - HBR)

M. A. McDuffie, 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: 11/27/89

Notary (Seal)



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NRC GENERIC LETTER 88-14, ITEM 1

"Verification by test that actual instrument air quality is consistent with the manufacturer's recommendations for individual components served."

RESPONSE:

The manufacturer's air quality requirements were verified for the safety-related components served. Air quality tests were performed at a representative sampling of locations by an outside contractor. In each case, the samples taken met the manufacturer's and FSAR requirements. Even though the FSAR dewpoint requirement was met, moisture/condensation is a concern and has been considered as a potential factor in previous failed components/plant trips at HBR2. A resolution to this moisture concern is being pursued as a separate project.

NRC GENERIC LETTER 88-14, ITEM 2

"Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air."

RESPONSE:

Maintenance procedures/practices, emergency and operating procedures, and training programs were reviewed to assess their adequacy with regard to ensuring that safety-related equipment would function as intended on loss of instrument air (IA). Emergency and operating procedures were found to be adequate. We found, however, that improvements are needed in the preventive maintenance area and in the System Description for Instrument Air (SD-017). Training programs for operations and maintenance were found to be adequate. Preventive maintenance measures are being added or revised to require the periodic replacement of IA regulator filters upstream of safety-related components, to require the blowdown of these components' IA supply lines, and to assure that air compressor maintenance is consistent for each compressor. SD-017 is being revised to include a list of instrument air-operated safety-related components and their failure position on loss of IA. SD-017 will be revised by March 31, 1989.

NRC GENERIC LETTER 88-14, ITEM 3

"Verification that the design of the entire instrument air system including air or other pneumatic accumulators is in accordance with its intended function, including verification by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of the normal instrument air system. This design verification should include an analysis of current air-operated component failure positions to verify that they are correct for assuring required safety functions."

RESPONSE:

Of the air-operated components determined to be safety-related, site Operations, Systems Engineering and On-site Nuclear Safety personnel independently verified the current failure position of each component and assured that it met its required safety function (i.e., correct failure position based on review of UFSAR Chapter 15 Accident Analyses). Based on this review, it has been determined that the Updated FSAR provides an adequate basis for the failure modes of air-operated safety-related components.

During the current Refueling Outage No. 12, a Special Procedure was developed to test each component to verify its failed position on loss of instrument air. Each component tested thus far has responded properly on loss of instrument air. At this time, one component remains to be tested; testing of this component is expected to be completed prior to synchronizing with the grid.

NRC GENERIC LETTER 88-14, UNNUMBERED ITEM

"In addition to the above, each licensee/applicant should provide a discussion of their program for maintaining proper instrument air quality."

RESPONSE:

Carolina Power & Light Company is evaluating the necessary requirements for a periodic Instrument Air (IA) Quality Monitoring Program. This program will be implemented at HBR2 following program development. Current plans are to obtain a laboratory analysis for hydrocarbons, particulate, and moisture at 18-month/refueling intervals. Moisture checks will be conducted periodically by the System Engineer using portable test equipment.