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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
TELEPHONE CONFERENCES WITH NRC REGION II ON APRIL 26 AND MAY 3, 1990

Gentlemen:

On the afternoon of April 26, 1990, a telephone conference was initiated between members of the H. B. Robinson Unit 2 (HBR2) staff and members of NRC Region II staff. The purpose of this discussion was to address five open items from NRC Inspection No. 90-08. This inspection was conducted by Mr. N. Merriweather in the area of Reg. Guide 1.97 implementation during the week of April 16 through 20, 1990.

Also, on the morning of May 3, 1990, a follow-up telephone conference was initiated between staff members of HBR2 and NRC Region II to continue discussion on Reg. Guide 1.97 issues, and to clarify commitments and understandings relative to environmental qualification testing of Patel conduit seals. This follow-up discussion also involved the site resident NRC inspectors.

The purpose of this submittal is to document these telephone conferences and the resultant commitments made during these discussions. To this end, please find as Attachment I the descriptions and commitments associated with the five open items from NRC Inspection No. 90-08. Also, provided as Attachment II is a summary of the understandings and commitments associated with environmental qualification testing of Patel conduit seals. Attachment III provides the schedule for conduit seal testing which was discussed during the May 3rd telephone conference.

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Should you have any questions regarding any of the information provided, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,

C. R. Dietz
Manager
Robinson Nuclear Project Department

CTB:sgk

Attachments

cc: Mr. S. D. Ebneter
Mr. L. W. Garner

Attachment I

Open Items from NRC Inspection No. 90-08

1. Weakness in Drawings

   a. Post Accident Monitoring (PAM) Panel Drawings

      Controlled Wiring Diagrams (CWDs) 336A, 336B, 533, 878, 1700, 1701, and 1702 (containment water level, wide range pressure, hydrogen concentration, and core exit temperature) will be reviewed and revised as appropriate. Hagan drawings HBR2-8607 and 5379-3502 will be reviewed and revised as appropriate. Also, drawing M872-E3640 will be reviewed to determine an appropriate method for incorporating this information, including AC power sources, into controlled plant drawings. Required drawing revisions will be completed by July 27, 1990.

   b. Hagan Drawings and Other CWDs

      CWDs 511 and 514 have a potential error in the control circuit for the containment HVH units. Other Hagan drawings were specifically identified as examples of weakness within the Hagan drawings.

      To address this weakness, CWDs 511 and 514 will be reviewed and revised. Also, remaining Hagan drawings will be reviewed to determine an effective method of designating or identifying source(s) of AC power. This will involve approximately 76 Hagan drawings. Required drawing revisions will be completed by April 26, 1991.

2. Completeness of Q-List

   a. Short-Term Actions

      All Reg. Guide 1.97 Category 1 variables will be included in the Q-List by tag number. In addition, safety-related Category 2 variables will be also included in the Q-List by tag number. These changes will be completed by July 27, 1990.

   b. Long-Term Actions

      A determination will be made whether nonsafety-related Category 2 variables should be included in the Q-List. This may require a detailed review of the history of the affected components, and appears to only affect eight variables, or 20 to 30 instruments loops. Also, four of these variables will be affected by upcoming plant modifications. This determination will be made, with identified changes completed, by October 25, 1991.

3. Identification and Marking

First, documentation will be provided to state the reasons and bases for marking of Control Board meter indications, and not marking Control Board switches and indicating lights.

Second, correct tag numbers will be verified for the PAM Panel and proper tags will be installed for PAM Panel instrumentation.

Both of the above commitments will be completed by July 27, 1990.

4. Calibration of ERFIS Inputs/Overlap Testing

a. Short-Term Actions

As discussed within Item 5 below, six ERFIS points will be used as interim indications until permanent resolution is implemented for the PAM Panel recorder. These six points will be validated to assure the reliability and accuracy of this indication. This action will be completed prior to startup from the 1990 Refueling Outage.

Also, computer calibration sheets have been compared to maintenance calibration sheets to assure consistency and to assure that ERFIS points are addressed within these calibration sheets. This action was completed on May 4, 1990, and it was verified that all ERFIS points are addressed within the maintenance calibration sheets.

b. Long-Term Actions

Validation of ERFIS information for remaining items includes approximately 132 limit switches associated with approximately 66 valves, and also includes 25 instruments which envelope the six ERFIS points discussed within Item 4.a above. Existing procedures will be revised to address validation of these items. These procedures will be revised by December 31, 1991. This due date is necessary to allow coordination of these revisions with other revisions to these procedures which are already required by the In-Service Inspection Program and the Managed Valve Maintenance Program.

5. Out of Service PAM Panel Recorder

The recorder for containment wide range pressure, containment water level, and containment hydrogen concentration has been out of service since March of 1989. This is primarily due to the unavailability of replacement parts and the overall obsolescence of the recorder. Separate indication for these parameters is available on the PAM Panel, and trending information is available from the Safety Parameter Display System (SPDS) and the ERFIS. Also, these points are available on ERFIS for long term recovery of data. Validation of these ERFIS points will be performed as stated in Item 4.a above.

A replacement recorder will be facilitated through a Plant Improvement Request form and will be addressed within the 1991 budget and prioritization process.

Attachment II

Environmental Qualification Testing of Patel Conduit Seals

Prior correspondence between CP&L and the NRC indicated that necessary actions would be completed to either environmentally qualify Patel conduit seals or to install some other environmentally qualified conduit seal. This prior correspondence indicated that these actions would be completed prior to startup from the 1990 Refueling Outage. However, in a January telephone conference between HBR2 and NRC staff, it was indicated that this conduit seal testing would be completed by July of 1990. Due to various reasons, the schedule for completion of this testing has slipped to September, 1990.

Provided as Attachment III is a current time line for completion of this testing, and the subsequent preparation of reports and closing documentation. This time line is furnished for informational purposes and is not considered to constitute any commitments above and beyond those specifically stated. Should any noteworthy schedule slippage or variation occur, this information will be provided to the site resident NRC inspector in a timely manner. CP&L also understands that members of the NRC staff may want to observe certain phases of the qualification testing.

CP&L understands that any corrective actions identified as a result of this testing will be implemented prior to startup from the 1990 Refueling Outage. The intent of this commitment is to have installed environmentally qualified conduit seals, with satisfactory qualification testing, prior to startup from the 1990 Refueling Outage.

Attachment III