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Carolina Power & Light Company

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INSPECTION REPORT 50-261/88-10

Gentlemen:

Carolina Power and Light Company (CP&L) provides this response to the alleged violations in the USNRC Inspection Report 88-10.

Alleged Severity Level V Violation RII-88-10-02-SL5

Technical Specification 6.5.1.1.1.a requires written procedures be established for procedures in Appendix A of Regulatory Guide 1.33 Revision 2, February 1978. Item 8.6 of Appendix A requires procedures for each surveillance test listed in Technical specifications. Item 28 of Technical Specification Table 4.1-1 requires testing of the Turbine Redundant Over Speed Trip System (TROTS).

Contrary to the above, written procedures were not adequately established in that MST-552 Revision 3, which implements Item 28 of Technical Specification Table 4.1-1, does not contain instructions to fully test TROTS. Specifically, testing of the turbine stop, control, reheat and intercept valve solenoids were not provided for in the test procedure.

Reply

1. Admission or denial of the alleged violation.

CP&L acknowledges the alleged violation with one exception. Upon further review of the TROTS Manufacturer's Technical Manual, and telephone conversations with the vendor, the testing of all 28 solenoids while on-line is not recommended and was never intended. Design testing capability of the TROTS on-line included only the high

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pressure turbine stop and governor valves. The Plant Nuclear Safety Committee (PNSC) has reviewed the issue and concluded that testing the stop and governor valve solenoids associated with TROTS on-line be performed at monthly intervals, and the reheat and intercept solenoids be tested off-line at refueling intervals. This meets the intent of the Technical Specification Testing Requirement, Item 28, Table 4.1-1.

2. Reason for the violation if admitted.

The TROTS logic is tested on a monthly basis and the speed channels are calibrated on a refueling basis. The actuation of the solenoids were never included in the surveillance procedure due to a misinterpretation of the Technical Specification functional testing requirement. Documentation of the 1970 change to the Plant Technical Specifications which incorporated TROTS requirements into Table 4.1-1, "Minimum Frequencies for Checks, Calibrations, and Test of Instrument Channels" is not conclusive enough to determine precisely why the Solenoid Testing Requirements were misinterpreted. An independent review of surveillance tests conducted during 1982 did not identify this testing inadequacy due to the backfit nature of the system and the unavailability of detailed background and design information. For this reason, we believe the TROTS test inadequacy to be an isolated instance and that other surveillance testing is adequate to assure compliance with Technical Specification requirements.

3. Corrective steps which have been taken and results achieved.

The TROTS system is presently being evaluated to determine if the system is currently required. A Special Procedure was developed to test the solenoids. The Plant was taken off-line on June 19, 1988, and this test was performed satisfactorily. The 28 solenoids previously scheduled for monthly testing have been re-evaluated by PNSC which concluded is that the 12 solenoids that are associated with the stop and governor valves should be tested on-line. A permanent test procedure was developed and the solenoids associated with the stop and governor valves were tested satisfactorily July 16, 1988. A permanent procedure is being developed to test the reheat and intercept valve solenoids at refueling intervals.

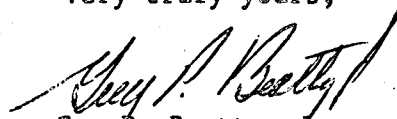
4. Corrective steps which will be taken to prevent repetition of the violation.

A permanent at-power surveillance test procedure has been developed and included in MST-552 to test the solenoids associated with the governor and stop valves on a monthly basis. The reheat and intercept valve solenoids for the TROTS will be tested at refueling intervals (MST-554).

5. Date when full compliance will be achieved.

Full compliance will be achieved with the action taken above.

Very truly yours,



Guy P. Beatty, Jr.

Vice President

Robinson Nuclear Project Department

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