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 ETZ,C.R. Carolina Power & Light Co.
 RECIPI.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 890307 ltr re violations noted in Insp Rept
 05-261/89-01.Corrective actions taken.

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APR. 06 1989

Robinson File No: 13510H

Serial: RNP/89-1129

United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/89-01

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation initiated by Inspection Report No. 50-261/89-01.

Severity Level IV Violation (RII-89-01-04-SL4)

10 CFR 50.55a(g):(4).(ii), states that inservice examinations of components and inservice tests to verify operational readiness of pumps and valves whose function is required for safety shall comply with the requirements of the Code (ASME Section XI).

ASME Boiler and Pressure Vessel Code-1977, Section XI, Paragraph IWV-3413(c), states that if an increase in stroke time of 25 percent or more from the previous test for valves with stroke times greater than ten seconds or 50 percent or more for valves with stroke times less than or equal to ten seconds is observed, test frequency shall be increased to once each month until corrective action is taken, at which time the original test frequency shall be resumed. In any case, any abnormality or erratic action shall be reported.

Contrary to the above, test records indicate that during the September 1988 outage, the stroke time for cold shutdown valve PCV-1716 increased by more than the Section XI limit of 50 percent and corrective action was not taken nor was the test frequency increased to once each month.

REPLY

(1) Admission or Denial of the Violation

CP&L acknowledges the violation.

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PDR ADOCK 05000261
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(2) Reason for the Violation

The ASME Section XI Code identifies under Article IWV-3412(a), valves that cannot be exercised during plant operations shall be specifically identified by the owner and shall be full-stroke exercised during cold shutdowns.

Safety-related valve PCV-1716 is designated as a cold shutdown frequency valve for testing. The valve was tested on September 6, 1988, during cold shutdown conditions in accordance with Plant Procedure OST-703, "ISI Primary Side Valve Test." The cold shutdown valve test procedure did not specify a time limitation for review of individual valve test data. As a result the valve test results were not fully evaluated for acceptability prior to leaving cold shutdown conditions on September 19, 1988. Although an evaluation of the valve was performed on September 19, 1988, this evaluation was never documented.

(3) The Corrective Steps Which Have Been Taken and The Results Achieved

PCV-1716 was again stroke time tested during the 1988 Refueling Outage which began in November. The recorded stroke times were found to be acceptable to ASME Code requirements when compared to the September test. However, the stroke times did indicate an increase in trend. If this trend continues as measured during the current cold shutdown, corrective action will be initiated.

(4) The Corrective Steps Which Will Be Taken to Avoid Further Violations

Plant procedures will be revised to require documentation of evaluation of valve stroke time results for valves required to be tested in the cold shutdown condition prior to leaving that condition. The procedures will ensure timely review of valve stroke time test data results for compliance with the requirements of the ASME Section XI Code. Although the procedures have not yet been revised, this practice was implemented during the 1988 Refueling Outage and will continue until the procedure revisions are complete.

(5) The Date When Full Compliance Will Be Achieved

The revised procedure will be implemented by July 1, 1989.

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Should you have any questions concerning this submittal, please contact
Mr. J. M. Curley, telephone (803) 383-1367.

Very truly yours,



C. R. Dietz
Manager

H. B. Robinson S. E. Plant

RDC:dwm

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO