

# REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co. 05000261  
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 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Summarizes 850726 telcon w/NRC re clarification on valve testing program. Info re feedwater regulating valves & post-maint testing included.

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Carolina Power & Light Company

AUG 14 1985

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Director of Nuclear Reactor Regulation  
Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
CONFERENCE CALL REGARDING VALVE TESTING PROGRAMS

Dear Mr. Varga:

A conference call was held on July 26, 1985 between Carolina Power & Light Company and the NRC to obtain clarification on the H. B. Robinson Unit No. 2 (HBR2) valve testing program. The conversation is summarized below:

Item 1 - Feedwater Regulating Valves

**Background** The Summer 1978 Addenda to the 1977 Edition of the ASME Code, Section XI, exempts system control valves from testing requirements. Code interpretation XI-1-83-59, issued with the 1985 Addenda of Section XI states, in brief, if a control valve has a safety related shutoff or full open function, it should be included in the testing program.

**HBR2 Position** HBR2 feedwater regulator valves are not in the valve testing program based on the 1978 Addenda exemption. The NRC was asked to state its position based on the code interpretation XI-1-83-59.

**NRC Response** If the valve must change position to accomplish a safety-related function, it should be tested in accordance with subsection IWV of Section XI regardless of the valve type.

Item 2 - Post Maintenance Testing

**HBR2 Position** The NRC was asked to state its position regarding post maintenance testing of valves which cannot be cycled during normal plant operation.

**NRC Response** If maintenance performed could affect valve operability, and cycling cannot be performed due to plant conditions, efforts should be made to assess valve operability without full stroke cycling. Such instances would be rare, and should be addressed on a case-by-case basis, taking into consideration the safety significance of the valve and its operation. Normal post maintenance testing should be completed at the earliest opportunity.

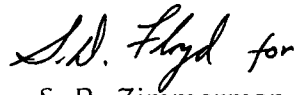
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Questions regarding this conversation should be directed to Barbara Teletzke at (919) 836-8293.

Yours very truly,

A handwritten signature in cursive script, appearing to read "S.R. Zimmerman for".

S. R. Zimmerman  
Manager  
Nuclear Licensing Section

BAT/crs (1805BAT)

cc: Dr. J. Nelson Grace (NRC-RII)  
Mr. G. Requa (NRC)  
Mr. H. Krug (NRC Resident Inspector - RNP)