

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Documents mod to replacement schedule for seals in commitment from ltr dtd 960827, from once every second refueling outage to once every third refueling outage.

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Carolina Power & Light Company

Robinson Nuclear Plant
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Serial: RNP-RA/99-0205

OCT 12 1999

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

**REVISION TO COMMITMENT TO NRC
REPLACEMENT OF CONTAINMENT PURGE VALVE SEALS**

Ladies and Gentlemen:

By letter dated August 27, 1996, Carolina Power & Light (CP&L) Company documented a commitment regarding the resilient seals on the containment purge and vent isolation valves for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The purpose of this letter is to document modification of the replacement schedule for the seals in that commitment from once every second refueling outage to once every third refueling outage. The committed frequency for replacement of the seals was established as part of the implementation of a plant modification in Refueling Outage 17. The plant modification replaced continuous monitoring of containment leakage through the valves with performance of penetration and containment isolation valve leakage testing on a periodic basis in accordance with 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors."

The increased frequency for replacement of the resilient seals for the containment purge and vent valves is justifiable based on the suitability of the seal material for the application and the service life of the seals. The seals are resilient ethylene propylene with service limits of 2.0×10^8 Rads, 300°F, 100% RH, and 100 psig and are suitable for use in the containment purge and vent valves. The manufacturer recommends a five year service life for the seals, equivalent to replacement of the seals every third refueling outage. This change in commitment also results in a reduction in occupational dose and maintenance costs.

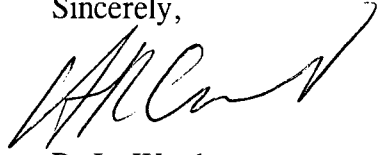
Therefore, the change in frequency for replacement of the resilient seals in the containment vent and purge valves is considered acceptable.

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If you have any questions on this subject, please contact Mr. H. K. Chernoff.

Sincerely,


for

R. L. Warden

Manager - Regulatory Affairs

ALG/alg

c: L. A. Reyes, NRC, Region II
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NRC Resident Inspector, HBRSEP