

ENCLOSURE 6  
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENDMENT REGARDING  
CONTAINMENT INTEGRATED LEAK RATE TESTING

TECHNICAL SPECIFICATION PAGES

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- (3) The allowable operational leakage rate,  $L_{to}$  (21), which shall be met before placing the containment into service and prior to resumption of power operation following a test (either as measured or following repairs and retest) shall be less than  $0.75L_t$  (42 or 21).

g. Frequency

After the initial preoperational leakage rate test, two integrated leak rate tests shall be performed at approximately equal intervals between the major shutdowns for inservice inspection conducted at ten-year intervals. In addition, an integrated leakage rate test shall be performed at the end of the ten-year interval, which may coincide with the inservice inspection shutdown period.

4.4.1.2 Sensitive or Local Leak Rate Test (SLRT)

- a. A sensitive leak rate test at 42 psig (testing of penetrations, certain containment isolation valves, and double gasket seals) except for the personnel air lock, will be performed at each refueling. The personnel air lock shall be tested every six months.
- b. Repairs and retest shall be performed whenever the combined leakage rate of the sensitive leak rate test exceeds 30 percent of  $L_p$ . For lesser leaks repairs are optional.

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<sup>1</sup>The period between the last test of the second 10 year inservice inspection period and the first test of the third inservice inspection ten year period will extend until the seventeenth refueling outage.

ENCLOSURE 7  
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR EXEMPTION: 10 CFR 50, APPENDIX J

Carolina Power & Light (CP&L) Company requests a schedular exemption from 10 CFR 50, Appendix J, Section III.D.1(a), in accordance with the provisions of 10 CFR 50.12. An exemption is necessary due to constraints associated with scheduling approximately equal intervals for testing over ten years of 15 month refueling outages. The next H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 refueling outage (RFO-16) is scheduled to commence in April, 1995. The following refueling outage (RFO-17) is scheduled to commence in September, 1996. The next required Type A test (i.e., Containment Integrated Leak Rate Test (ILRT)) is scheduled for RFO-16. The granting of a one-time extension of the period between the last Type A test of the second ten year interval inservice inspection period and the first Type A test of the third ten year inservice inspection interval will allow performance of the next Type A test in RFO-17.

NO UNDUE RISK

10 CFR 50.54(o) requires that the primary reactor containments for water cooled power reactors shall be subject to the requirements set forth in 10 CFR 50, Appendix J. Section III.D.1(a) of 10 CFR 50, Appendix J states, "After pre-operational leakage rate test, a set of three Type A tests shall be performed, at approximately equal intervals during each ten year service period." In accordance with 10 CFR 50.12(a)(1), Carolina Power & Light demonstrates herein that the requested schedular delay exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. The delay in the performance of the Type A test until RFO-17 does not pose undue risk as has been evaluated by the NRC in NUREG-1493 for a much larger interval (i.e., 20 years) which found such risks to be well below the NRC safety goals. HBRSEP has performed three individual Structural Integrity Tests and seven Type A tests with successful results. Added margin of safety is provided with conservatism from containment leakage support systems (Isolation Valve Seal Water (IVSW) system and Penetration Pressurization System (PPS)) to preclude and or minimize leakage. The proposed schedular exemption includes a request to perform the second Type A test approximately 55 months after the last Type A test of the second containment service period.

SPECIAL JUSTIFYING CIRCUMSTANCES

The NRC may, upon application, grant exemptions from the requirements of 10 CFR 50, where special circumstances are present. The special circumstances which justifies NRC approval of this schedular exemption request is consistent with exemption criteria (ii), (iii) and (v) of 10 CFR 50.12(a)(2).

10 CFR 50.12(a)(2)(ii) Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.

The interval requirements specified in 10 CFR 50, Appendix J, section III.D.1(a) are not necessary to achieve the underlying purpose of the rule. The purposes of containment leakage rate testing are:

- 1) to establish and maintain a level of confidence that any containment leakage, during a design basis accident, will remain less than or equal to the maximum allowable value,  $L_a$ , established by 10 CFR 50, Appendix J; and
- 2) to assure that periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, including systems and components penetrating the containment.

The history of successful results of the past three Structural Integrity Tests (SITs) and past Type A tests, together with monitoring/testing by containment isolation support systems (PPS/IVSW) will provide assurance of minimal undetected leakage from the containment, and provide sufficient means to achieve the underlying purpose of the regulation without the need for performing a Type A test in RFO-16. The discussion of the containment tests and monitoring systems in Enclosure 2 supports the conclusion that the requested schedular exemption to perform the first Type A test in the third ten year interval in RFO-17 will maintain the same level of confidence that any containment leakage will remain less than or equal to the maximum allowable leakage rate value,  $L_a$ , during the proposed one-time extension.

10 CFR 50.12(a)(2)(v) The exemption would provide only temporary relief from the applicable regulation and the licensee has made good faith efforts to comply with the regulation.

The requested exemption would provide only temporary relief pertaining to the first Type A test of the third containment 10 year service period. Approval of this one-time exemption would still require the performance of the test during RFO-17.