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SUBJECT: Provides editorial corrections to 10CFR50.92 significant hazards evaluation to clarify that portion of ECCS leakage test interval pertains to RHR portion of post accident recirculation heat removal sys.

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PRIORITY 1 DOCUMENT

CP&L

10 CFR 50.90

Carolina Power & Light Company
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 13510HA
Serial: RNP-RA/95-0078

APR 18 1995

U. S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
EDITORIAL CORRECTION TO REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE TO POST ACCIDENT HEAT REMOVAL SYSTEM TESTING

Gentlemen:

On April 13, 1995, Carolina Power and Light (CP&L) Company requested an emergency change to the Technical Specifications (TS) concerning the Post Accident Recirculation Heat Removal System in accordance with 10 CFR 50.90. This letter provides editorial corrections to the 10 CFR 50.92 significant hazards evaluation to clarify that the portion of the Emergency Core Cooling System leakage test interval pertains to the Residual Heat Removal portion of the Post Accident Recirculation Heat Removal System.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the corrected evaluation. Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b). Enclosure 2 details, in accordance with 10 CFR 50.92, the basis for the Company's conclusion that the requested change does not involve a significant hazards consideration.

Please refer any questions regarding this submittal to Mr. K. R. Jury at (803) 857-1363.

Very truly yours,

R. M. Krich
Manager - Regulatory Affairs

200011

Enclosures:
1. Affidavit
2. 10 CFR 50.92 Evaluation

c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. S. D. Ebneter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
Attorney General (SC)

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ENCLOSURE 1

Affidavit

C. S. Hinnant, having been first duly sworn, did dispose and say that the information contained in letter RNP-RA/95-0078 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

C S Hinnant

C. S. Hinnant

Sandra W. Rhodes

Notary (Seal)

My Commission Expires: My Commission Expires March 27, 1999

ENCLOSURE 2
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
EDITORIAL CORRECTION TO REQUEST FOR
TECHNICAL SPECIFICATIONS CHANGE TO
POST ACCIDENT HEAT REMOVAL SYSTEM TESTING

10 CFR 50.92 EVALUATION

We have concluded that the requested change to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) to revise the TS Section 4.4.3.f, g, and h, Post Accident Recirculation Heat Removal System surveillance test interval, from a 12-month test interval to a refueling outage interval does not involve a significant hazards determination. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

Basis

This change does not involve a significant hazards consideration for the following reasons.

1. The requested change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The requested amendment will change the interval for the Residual Heat Removal portion of the Post Accident Recirculation Heat Removal System leakage test from a "12-month interval" to "refueling." Since operation of the Emergency Core Cooling System (ECCS) in the recirculation mode of operation is not a precursor to an accident evaluated in the safety analysis report, the probability of occurrence of any accident evaluated in the safety analysis report is unchanged. The dose consequences to the control room operators analyzed in Updated Final Safety Analysis Report (UFSAR) Section 6.4 include a dose component from total ECCS leakage during the recirculation phase. The refueling surveillance interval for the ECCS leakage minimization program has already been reviewed by the NRC, and has been included in the current licensing basis as Operating License (OL) Condition 3.G(2). This OL Condition specifies that an integrated leak test for each system be conducted at a frequency not to exceed refueling cycle intervals. Because the total leakage allowed by TS 4.4.3 is maintained and the lengthening of the surveillance interval is effectively insignificant, this change does not constitute an increase in the consequences of an accident previously analyzed.

2. The requested change does not create the possibility of a new kind of accident from any accident previously evaluated. The change in test frequency does not effect the ability of the ECCS leakage minimization program to perform its intended function. No new accident scenarios are introduced by performing the required test while in shutdown conditions. None of the analyzed accident scenarios or assumptions are changed by the extension of this surveillance interval. Therefore, the possibility or probability of occurrence of any new accident from any accident previously evaluated is unchanged.

3. The requested change does not involve a significant reduction in the margin of safety. The margin of safety, as defined in TS Section 4.4.3 of two gallons per hour, is not reduced by this change since this margin is applied to all post accident recirculation systems. The UFSAR accident analyses do not include a specific contribution to the off-site dose consequences from post-accident recirculation leakage. However, the dose consequences to the control room operators analyzed in UFSAR Section 6.4, which was performed in response to Three Mile Island (TMI) Action Item III.D.3.4 and provided to the NRC in a letter dated May 21, 1990, and the NRC's off-site dose consequences in the Safety Evaluation Report (SER) for the license amendment to uprate reactor power from 2200 Megawatts thermal (MWt) to 2300 MWt, both included a dose component from ECCS leakage during the recirculation phase. In the control room dose calculation, a value of four gallons per hour, which is two times the TS assumed two gallons per hour leakage requirement was used for conservatism as discussed in a letter to the NRC dated September 5, 1990. Increasing the length of the surveillance interval to refueling has no effect on system leakage since the system is not normally operated during power operation and the system does not experience significant wear and tear during the surveillance interval.