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SUBJECT: Application for amend to license DPR-23. Amend would clarify requirements in TS Section 3.8, "Refueling."

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10 CFR 50.90

Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA
Serial: RNP-RA/95-0106

JUL 17 1995

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT No. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
REGARDING FLOW REQUIREMENTS FOR REFUELING FILTER SYSTEM FANS

Gentlemen:

In accordance with 10 CFR 50.90, Carolina Power & Light (CP&L) Company is submitting a request for change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed TS change clarifies the requirements in TS Section 3.8, "Refueling." The proposed change to TS will specify that the Spent Fuel Building refueling filter fan and at least one Containment purge fan shall be shown to operate within $\pm 10\%$ of the design flow instead of the current requirement that "... all filter system fans shall be shown to operate within $\pm 10\%$ of the design flow. . . ." The reason for requesting this change to the TS is to clarify that the requirement applies only to equipment applicable to the scope of TS Section 3.8 in support of safe refueling operations and does not apply to all filter system fans at HBRSEP, Unit No. 2.

Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b).

Enclosure 2 provides a detailed description of the proposed change and the basis for the proposed change.

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for our conclusion that the proposed change does not involve a significant hazards consideration.

Enclosure 4 provides environmental considerations which demonstrate that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), we propose that no environmental assessment needs to be prepared in connection with the issuance of the proposed change to the TS.

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Enclosure 5 provides page change instructions for incorporating the proposed change.

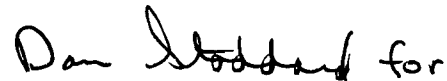
Enclosure 6 provides the proposed TS page.

In accordance with 10 CFR 50.91(b), we are providing the State of South Carolina with a copy of the proposed change to the TS.

In order to allow time for procedure revision and orderly incorporation into copies of the TS, we request that the proposed change, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the change to the TS.

Please refer any questions regarding this submittal to Mr. A. L. Garrou at (803) 857-1544.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dan Stoddard for".

R. M. Krich
Manager - Regulatory Affairs

Enclosures:

1. Affidavit
 2. Basis for Change Request
 3. 10 CFR 50.92 Evaluation
 4. Environmental Considerations
 5. Page Change Instructions
 6. Technical Specifications Page
- c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. S. D. Ebnetter, 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)

Enclosure 1
Affidavit

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/95-0106 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.

CS Hinnant

Albert H. Carron

Notary (Seal)

My commission expires:

March 22, 2005

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NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
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BASIS FOR PROPOSED CHANGE

Proposed Change

In accordance with 10 CFR 50.90, Carolina Power & Light (CP&L) Company is submitting a request for a change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The purpose of this proposed change is to clarify the requirements concerning the design flow for the Containment purge and Spent Fuel Building refueling filter system fans.

The proposed change to TS is to revise Section 3.8.2 c. This section currently states "All filter system fans shall be shown to operate within $\pm 10\%$ of the design flow." The proposed requirements are as follows.

- c.1 The Spent Fuel Building refueling filter fan shall be shown to operate within $\pm 10\%$ of the design flow.
- c.2 At least one Containment purge filter fan shall be shown to operate within $\pm 10\%$ of the design flow and must be operable during core alterations or movement of irradiated fuel assemblies, or at least one automatic containment isolation valve in each line penetrating the containment which provides a direct path from the containment atmosphere to the outside atmosphere shall be securely closed.

Basis

The containment radiation level is constantly monitored during refueling operations. An increase in the level of radiation beyond the radiation monitor setpoint limits initiates an alarm and causes the purge valves to close, thereby preventing a release of radioactive effluents.

If the Containment purge filter system fans are out of service, a containment purge is not required during fuel movement or core alterations as long as one automatic containment isolation valve is secured in each line penetrating the containment structure which provides a direct path to the outside atmosphere. Therefore, the operation of all filter system fans as currently stated in TS Section 3.8.2.c is not a requirement of the Design Basis Fuel Handling Accident analysis contained in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.4.

Containment purge filter fans (i.e., Heating and Ventilation Exhaust (HVE)-1A and HVE-1B) and the Spent Fuel Building refueling filter fan (i.e., HVE-15A) are designed to filter the radioactive material release resulting from a design basis fuel handling accident and in so doing mitigate the dose consequences to the public from a fuel handling accident. The accident analysis in UFSAR Section 15.7.4 states that the ventilation system in both the Containment and the Spent Fuel Building are in operation under administrative control during refueling operations. The TS requirement to test and ensure that the filtration flow rate remains within $\pm 10\%$ of design flow should therefore be applicable to filter system fans HVE-1A, HVE-1B, and HVE-15A.

Conclusion

The proposed change to TS Section 3.8.2 does not alter the current operating requirements for the filter system fans. Identifying specific filter system fans HVE-1A, HVE-1B, and HVE-15A as the filter system fans required during refueling operations is an enhancement to clarify TS Section 3.8.2.

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10 CFR 50.92 EVALUATION

We have concluded that the proposed change to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) to clarify design flow conditions for refueling filter system fans does not involve a significant hazards consideration. In support of this conclusion, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

Proposed Change

The proposed change to TS is to revise Section 3.8.2 c. This TS section currently states "All filter system fans shall be shown to operate within $\pm 10\%$ of the design flow." The proposed requirements are as follows.

- c.1 The Spent Fuel Building refueling filter fan shall be shown to operate within $\pm 10\%$ of the design flow.
- c.2 At least one Containment purge filter fan shall be shown to operate within $\pm 10\%$ of the design flow and must be operable during core alterations or movement of irradiated fuel assemblies, or at least one automatic containment isolation valve in each line penetrating the containment which provides a direct path from the containment atmosphere to the outside atmosphere shall be securely closed.

Basis

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

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change clarifies the operating requirements for the Containment purge and Spent Fuel Building refueling filter systems. This proposed change to the TS specifically delineates the fan filter systems required for refueling operations and does not change the physical operation of the filter systems. The affected systems are not involved in the initiation of any accident. The system response to previously analyzed accidents, including system flows and filter efficiencies will not be altered by the proposed change. These changes are enhancements to clarify existing TS requirements that will not increase the probability or consequences of a previously analyzed accident.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change merely clarifies the specific filter systems that are necessary to mitigate a fuel handling accident during core alterations or the movement of irradiated fuel assemblies and is consistent with the accident analysis in Section 15.7.4 of the Updated Final Safety Analysis Report (UFSAR). This proposed change does not involve the addition or modification of plant equipment, nor does it alter the design or operation of plant systems. Therefore, operation of the facility in accordance with the proposed TS change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed change clarifies which filter systems that must be capable of mitigating a design basis fuel handling accident during core alterations or the movement of irradiated fuel assemblies and is consistent with the accident analysis in Section 15.7.4 of the UFSAR. The proposed change will not result in an increase in the Control Room or offsite radiation doses. The performance of the filtration systems, including adsorption efficiencies, will not change. Therefore, the proposed change does not involve a reduction in a margin of safety.

Conclusion

Based on the above significant hazards evaluation, Carolina Power & Light Company has concluded that the proposed change does not involve any significant hazards considerations.

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ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A change to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the change would not (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site; or (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this proposed change to the Technical Specifications (TS) and concluded that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of an amendment to the TS that reflects the proposed change. The basis for this conclusion follows.

Requested Change

The proposed change to TS is to revise Section 3.8.2 c. This section currently states "All filter system fans shall be shown to operate within $\pm 10\%$ of the design flow." The proposed requirements are as follows.

- c.1 The Spent Fuel Building refueling filter fan shall be shown to operate within $\pm 10\%$ of the design flow.
- c.2 At least one Containment purge filter fan shall be shown to operate within $\pm 10\%$ of the design flow and must be operable during core alterations or movement of irradiated fuel assemblies, or at least one automatic containment isolation valve in each line penetrating the containment which provides a direct path from the containment atmosphere to the outside atmosphere shall be securely closed.

Basis

Operation of H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 in accordance with the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons.

1. As demonstrated in Enclosure 3, the proposed change does not involve a significant hazards consideration.
2. Implementation of the proposed change does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site. The proposed change clarifies the operating requirements for the Containment purge and Spent Fuel Building refueling filter systems. This proposed change to the TS specifically delineates the systems required for refueling operations and does not change the physical operation of the filter systems. This proposed change does not involve the addition or modification of plant equipment, nor does it alter the design or operation of plant systems. There is no involvement of effluent transfer, addition or loss. Implementation of the proposed change will not alter any technical criterion regarding the risk of effluent release. This risk will remain unchanged.
3. Implementation of the proposed change does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change clarifies the operating requirements for the Containment purge and Spent Fuel Building refueling filter systems. This proposed change to the TS specifically delineates the systems required for refueling operations and does not change the physical operation of the filter systems. Implementation of this proposed change does not involve the addition or modification of plant equipment, nor does it alter the design or operation of plant systems. The testing of the Containment purge and Spent Fuel Building refueling filter systems will continue to be performed in the same manner and will result in no change in individual or cumulative occupational exposure. No operation of the plant involving the accumulation of occupational dose by individuals is affected by the proposed change. Therefore, implementation of the proposed change will have no affect on either individual or cumulative occupational radiation exposure.

Enclosure 5 to Serial: RNP-RA/95-0106

H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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PAGE CHANGE INSTRUCTIONS

<u>Removed Page</u>	<u>Inserted Page</u>
3.8-3	3.8-3

Enclosure 6 to Serial: RNP-RA/95-0106

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TECHNICAL SPECIFICATION PAGES