

United States Nuclear Regulatory Commission
Enclosure 5 to Serial: RNP-RA/96-0074

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
CLARIFICATION OF SURVEILLANCE REQUIREMENTS

TECHNICAL SPECIFICATIONS PAGES

9604080156 960329
PDR ADOCK 05000261
P PDR

4.0 SURVEILLANCE REQUIREMENTS

Specified intervals may be adjusted plus or minus 25% to accommodate normal test schedules. Performance of any surveillance test outlined in these specifications is not required when the system or component is out of service as permitted by the Limiting Conditions for Operation. Prior to returning the system to service, the specified calibration and testing surveillance shall be performed.

If it is discovered that a Surveillance Requirement, as defined by Specification 4.0 and 4.0.1(e.), was not performed within its specified frequency, then compliance with the requirement to declare that the Technical Specifications requirements are not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, then the Technical Specifications requirements must immediately be declared not met, and the applicable action requirements must be undertaken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Technical Specifications requirements must be immediately declared not met and the applicable action requirements must be undertaken.

4.0.1 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.
- e. The provisions of Specification 4.0 are applicable to the above required frequencies for performing inservice inspection and testing activities.

Basis

The provisions of this specification establish the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. The limitation of Specification 4.0 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

The provisions of Specifications 4.0 and 4.0.1e. are not intended to be used repeatedly merely as an operational convenience to extend surveillance intervals or periodic completion time intervals beyond those specified.

Specification 4.0 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specifications 4.0 and 4.0.1e., and not at the time that the specified frequency was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

The basis for the delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0 allows the full delay period of 24 hours to perform the surveillance.

Failure to comply with specified frequencies for surveillances is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the surveillance within the delay period allowed by this specification, or within the completion time of the actions, restores compliance with respect to operability of the component or system.

Containment Spray System

- 4.5.1.3 System tests shall be performed at each refueling interval. The test shall be performed with the isolation valves in the spray supply lines at the containment and spray additive tank blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.
- 4.5.1.4 Verify each spray nozzle is unobstructed at least every 10 years.
- 4.5.1.5 The tests discussed in 4.5.1.3 and 4.5.1.4 will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

Containment Fan Coolers

- 4.5.1.6 Each fan cooler unit shall be tested at monthly intervals to verify proper operation of all essential features including valves, dampers and piping.

4.5.2 Component Verification

- 4.5.2.1 When the reactor coolant pressure is in excess of 1,000 psi, it shall be verified at least once per 12 hours (from the RTGB indicators/controls) that the following valves are in their proper position with control power to the valve operators removed.

<u>Valve Number</u>	<u>Valve Position</u>
1- MOV 862 A&B	Open
2- MOV 863 A&B	Closed
3- MOV 864 A&B	Open
4- MOV 866 A&B	Closed

Applicability

Applies to periodic testing requirements of the turbine-driven and motor-driven auxiliary feedwater pumps.

Objective

To verify the operability of the auxiliary feedwater system and its ability to respond properly when required.

Specification

- 4.8.1 Each motor driven auxiliary feedwater pump will be started at monthly intervals, run for 15 minutes, and determined that it is operable.
- 4.8.2 The steam turbine driven auxiliary feedwater pump by using motor operated steam admission valves will be started at monthly intervals, run for 15 minutes, and determined that it is operable when the reactor coolant system is above the cold shutdown condition. When periods of reactor cold shutdown extend this interval beyond one month, the test shall be performed within 24 hours of achieving stable plant conditions at ≥ 1000 psig in the steam generator following plant heatup.
- 4.8.3 The auxiliary feedwater pumps discharge valves will be tested by operator action at monthly intervals.
- 4.8.4 These tests shall be considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly.

4.16 RADIOACTIVE SOURCE LEAKAGE TESTING

Applicability:

Applies to by-product, source and special nuclear radioactive material used at H. B. Robinson Unit 2.

Objective:

The objective of this specification is to assure that leakage from by-product, source, and special nuclear radioactive material sources does not exceed allowable limits.

Specification:

- 4.16.1 The leakage test shall be capable of detecting the presence of .005 microcurie of radioactive material on the test sample. If the test reveals the presence of .005 microcurie or more of removable contamination, it shall immediately be withdrawn from use, decontaminated, and repaired, or be disposed of in accordance with Commission regulations. Sealed sources are exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.
- 4.16.2 Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the Commission or an agreement State as follows:
- A. Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at semi-annual intervals. I
 - B. The periodic leak test required does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another user unless they have been leak tested within six months prior to the date of use or transfer.

In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, sealed sources shall not be put into use until tested.
 - C. Startup sources shall be leak tested prior to and following any repair or maintenance and before being subjected to core flux.

4.0 SURVEILLANCE REQUIREMENTS

Specified intervals may be adjusted plus or minus 25% to accommodate normal test schedules. Performance of any surveillance test outlined in these specifications is not required when the system or component is out of service as permitted by the Limiting Conditions for Operation. Prior to returning the system to service, the specified calibration and testing surveillance shall be performed.

add: insert A here

4.0.1 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

add: insert B here
Basis

The provisions of this specification establish the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified

delete

with an 18 month surveillance interval. It is intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

delete

add: insert C here as paragraph 2

add: insert D here as paragraphs 3
through 78
etc

Insert A

If it is discovered that a Surveillance Requirement, as defined by Specification 4.0 and 4.0.1(e.), was not performed within its specified frequency, then compliance with the requirement to declare that the Technical Specifications requirements are not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, then the Technical Specifications requirements must immediately be declared not met, and the applicable action requirements must be undertaken.

When the Surveillance is performed within the delay period and the Sureveillance is not met, the Technical Specifications requirements must be immediately be declared not met and the applicable action requirements must be undertaken.

Insert B

- e. The provisions of Specification 4.0 are applicable to the above required frequencies for performing inservice inspection and testing activities.

Insert C

The provisions of Specifications 4.0 and 4.0.1e. are not intended to be used repeatedly merely as an operational convenience to extend surveillance intervals or periodic completion time intervals beyond those specified.

Insert D

Specification 4.0 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specifications 4.0 and 4.0.1e., and not at the time that the specified frequency was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

The basis for the delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0 allows the full delay period of 24 hours to perform the surveillance.

Failure to comply with specified frequencies for surveillances is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the surveillance within the delay period allowed by this specification, or within the completion time of the actions, restores compliance with respect to operability of the component or system.

Containment Spray System

Page 21 of 23

4.5.1.3 System tests shall be performed at each refueling interval. The test shall be performed with the isolation valves in the spray supply lines at the containment and spray additive tank blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.

4.5.1.4 Verify each spray nozzle is unobstructed at least every 10 years. |

4.5.1.5 The tests discussed in 4.5.1.3 and 4.5.1.4 will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

Containment Fan Coolers

4.5.1.6 Each fan cooler unit shall be tested at ^{monthly intervals} ~~intervals not to exceed one month~~ to verify proper operation of all essential features including valves, dampers and piping. delete

4.5.2 Component Verification

4.5.2.1 When the reactor coolant pressure is in excess of 1,000 psi, it shall be verified at least once per 12 hours (from the RTGB indicators/controls) that the following valves are in their proper position with control power to the valve operators removed.

Valve Number

Valve Position

1- MOV 862 A&B

Open

2- MOV 863 A&B

Closed

3- MOV 864 A&B

Open

4- MOV 866 A&B

Closed

Applicability

Applies to periodic testing requirements of the turbine-driven and motor-driven auxiliary feedwater pumps.

Objective

To verify the operability of the auxiliary feedwater system and its ability to respond properly when required.

Specification

- 4.8.1 Each motor driven auxiliary feedwater pump will be started at ^{monthly} intervals ~~not to exceed one month~~, run for 15 minutes, and determined that it is operable. ~~delete~~
- 4.8.2 The steam turbine driven auxiliary feedwater pump by using motor operated steam admission valves will be started at ^{monthly} intervals ~~not~~ ~~delete~~ ~~to exceed one month~~, run for 15 minutes, and determined that it is operable when the reactor coolant system is above the cold shutdown condition. When periods of reactor cold shutdown extend this interval beyond one month, the test shall be performed ~~delete~~ immediately following ^{plant} reactor heatup. ~~add: within 24 hours of achieving stable plant conditions at ≥ 1000 psig in the steam generator.~~
- 4.8.3 The auxiliary feedwater pumps discharge valves will be tested by operator action at ^{monthly intervals} ~~intervals not greater than one month~~. ~~delete~~
- 4.8.4 These tests shall be considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly.

page 23 of 23

4.16 RADIOACTIVE SOURCE LEAKAGE TESTING

Applicability:

Applies to by-product, source and special nuclear radioactive material used at H. B. Robinson Unit 2.

Objective:

The objective of this specification is to assure that leakage from by-product, source, and special nuclear radioactive material sources does not exceed allowable limits.

Specification:

- 4.16.1 The leakage test shall be capable of detecting the presence of .005 microcurie of radioactive material on the test sample. If the test reveals the presence of .005 microcurie or more of removable contamination, it shall immediately be withdrawn from use, decontaminated, and repaired, or be disposed of in accordance with Commission regulations. Sealed sources are exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.
- 4.16.2 Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the Commission or an agreement State as follows:
- A. Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at ~~intervals not to exceed six months.~~ *delete*
semi-annual intervals
 - B. The periodic leak test required does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another user unless they have been leak tested within six months prior to the date of use or transfer.

In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, sealed sources shall not be put into use until tested.
 - C. Startup sources shall be leak tested prior to and following any repair or maintenance and before being subjected to core flux.