

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Application for amend to license DPR-23,correcting name for
actuation signal in surveillance requirement.Util requests
that proposed change be reviewed & approved by Apr 1,2000.

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C A T E G O R Y 1 D O C U M E N T

**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Serial: RNP-RA/99-0185

SEP 28 1999

United States Nuclear Regulatory Commission
Attn: 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 TECHNICAL SPECIFICATION
CHANGE, COMPONENT COOLING WATER SYSTEM**

Sir or Madam:

Carolina Power & Light (CP&L) Company requests a change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 in accordance with 10 CFR 50.90. The proposed change corrects the name for an actuation signal in a Surveillance Requirement.

Attachment I provides an affidavit as required by 10 CFR 50.30(b).

Attachment II provides a description of the current condition, a description of the proposed change, a safety assessment, a basis for a conclusion that the proposed change does not involve a significant hazards consideration and an environmental impact consideration which demonstrates that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)((9) and (10)).

Attachment III provides a markup of the TS and Bases.

Attachment IV provides retyped pages for the TS and Bases.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of this letter with attachments.

CP&L requests that the proposed change be reviewed and approved by April 1, 2000.

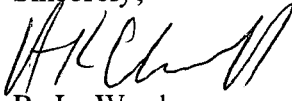
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If you have any questions on this subject, please contact Mr. H. K. Chernoff.

Sincerely,


R. L. Warden
Manager - Regulatory Affairs

ALG/alg

Attachments

- I. Affidavit
- II. Request for Technical Specification Change, Component Cooling Water System
- III. Markup of Current Technical Specification and Bases Pages
- IV. Retyped Technical Specification and Bases

c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
NRC Resident Inspector, HBRSEP
Mr. L. A. Reyes, NRC, Region II
Mr. R. Subbaratnam, NRC, NRR
Attorney General (SC) (w/out Enclosures)

Affidavit

State of South Carolina

County of Darlington

D. E. Young, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/99-0185 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.

Dale E. Young

Sworn to and subscribed before me

this 28th day of September 19 99

(Seal) Albert A. Canon
Notary Public for South Carolina

My commission expires: March 22nd 2005

H. B. Robinson Steam Electric Plant, Unit No. 2
REQUEST FOR TECHNICAL SPECIFICATION CHANGE
COMPONENT COOLING WATER SYSTEM

Description of Current Condition

Technical Specification (TS) 3.7.6, "Component Cooling Water (CCW) System," Surveillance Requirement (SR) 3.7.6.2, states, "Verify each required CCW pump starts automatically on an actual or simulated ESFAS actuation signal." A recent review of the logic drawings for the automatic start circuits for the required CCW pumps found that the actuation signal for the CCW pumps is from the Loss of Power Diesel Generator (LOP DG) Start undervoltage signal. LOP DG Start Instrumentation is specified in Limiting Condition for Operations (LCO) 3.3.5, "LOP DG Start Instrumentation," and not in LCO 3.3.2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation." Therefore the actuation signal for the required CCW pumps is not correctly stated in SR 3.7.6.2.

Description of the Proposed Change

SR 3.7.6.2 is proposed to be revised to state, "Verify each required CCW pump starts automatically on an actual or simulated LOP DG Start undervoltage signal."

Safety Assessment

The CCW System consists of three pumps, two heat exchangers, a supply and return header, a surge tank, and associated piping, valves, and instrumentation. The required (i.e., "B" and "C") CCW pumps are each powered by a separate safety related electrical bus. The "A" CCW pump is powered by the nonsafety related dedicated shutdown bus. SR 3.7.6.2 verifies proper automatic operation of the required CCW pumps on an actual or simulated signal.

The proposed change to SR 3.7.6.2 reflects the original plant design which was not properly reflected in the conversion of the TS to the improved TS. There is no automatic actuation of the required CCW pumps from the ESFAS. The CCW pumps automatically start on low pump discharge header pressure. The CCW pumps in operation upon initiation of a Safety Injection (SI) signal will continue to operate as long as normal power is available. Upon a Loss of Offsite Power (LOOP), the required CCW pumps are automatically loaded onto the Emergency Diesel Generator (EDG) buses as long as an SI signal is not present. If a Containment Spray (CS) signal occurs, while an SI signal is present, and the emergency buses are powered by the EDGs, the CCW pumps are tripped from the EDG buses. The required CCW pumps are not loaded onto the EDG buses as part of the SI loading sequence, however, they are capable of manual start when EDG loads allow.

The CCW system flow is required to protect the Reactor Coolant Pump (RCP) seals in the event of a LOOP by cooling the charging pump hydraulic couplers and the RCP thermal barriers. Cooling of the RCP seals with CCW and/or the charging system minimizes the likelihood for failure of the RCP seals during a LOOP which could lead to a Loss-of-Coolant Accident (LOCA). In a large break LOCA, the CCW pumps are not required during the injection phase because the Emergency Core Cooling System (ECCS) pump seals and the CS pump seals are designed for self cooling with water from the Refueling Water Storage Tank. A CCW pump is then manually started during the manual operation of switchover of the ECCS from the injection phase to the recirculation phase. In a small break LOCA, or in events with ECCS initiation other than a large break LOCA, a CCW pump is started manually in accordance with emergency operating procedures. The signal to trip the CCW pumps when a CS spray and SI signal are present when the EDGs are loaded onto the emergency buses is tested at a Frequency of 18 months along with other load shed trip signals that ensure OPERABILITY of the EDGs.

Therefore, the proposed change to SR 3.7.6.2 to correct the stated source of the actuation signal is acceptable because it reflects the actual plant design and because the LOP DG Start undervoltage signal to start the required CCW pumps is a system that is part of the primary success path which actuates to mitigate a design basis accident or transient (i.e., the LOP DG Start signal to the required CCW pumps meets 10 CFR 50.36, Criterion 3).

No Significant Hazards Consideration Determination

Carolina Power & Light (CP&L) Company has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. The CP&L conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change to Surveillance Requirement (SR) 3.7.6.2 does not involve any physical alteration of plant systems, structures or components, changes in parameters governing normal plant operation, or methods of operation. The safety function of the Loss of Power (LOP) Diesel Generator (DG) start signal for the Component Cooling Water (CCW) pumps is to start the CCW pumps in order to provide the minimum heat removal capability assumed in the safety analysis for the systems to which it supplies cooling water. The CCW System provides a heat sink for the removal of process and operating heat from safety related components during a Design Basis Accident (DBA) or transient. During normal operation, the CCW System also provides this function for various nonessential components, as well as the spent fuel storage pool. The CCW System serves as a barrier to the release of radioactive byproducts between potentially radioactive systems and the Service Water System, and thus to the environment. The CCW pumps start upon receipt of a LOP DG start signal from undervoltage on the emergency bus. The LOP DG start signal to the CCW pumps is not an Engineered Safety Features Actuation System (ESFAS) signal. Since this proposed change only corrects the description of the start signal, the proposed change does not involve an increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve any physical alteration of plant systems, structures or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce a new mode of operation or changes in the method of normal plant operation. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

3. Does this change involve a significant reduction in a margin of safety?

The proposed change corrects the word description of the start signal for the CCW pumps and does not alter any plant design margin or analysis assumption as described

in the Updated Final Safety Analysis Report. The proposed change does not affect any limiting safety system setpoint, calibration method, or setpoint calculation. Therefore, the proposed change does not involve a reduction in a margin of safety.

Environmental Impact Consideration

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulator actions for categorical exclusion for performing an environmental assessment. A proposed change for an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed change would not (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increases in the amounts of any effluents that may be released offsite; (3) result in an increase in individual or cumulative occupational radiation exposure. This request has been reviewed and has been determined to meet 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 with the amendment. The basis for this determination follows.

Proposed Change

This request proposes to change to Surveillance Requirement (SR) 3.7.6.2 to correct the word description of the start signal for the CCW pumps.

Basis

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 the No Significant Hazards Evaluation, the proposed change does not involve a significant hazards consideration.
2. The proposed change is limited to the description of the start signal for the CCW pumps. This change does not affect plant power level or effluents, nor does this change increase the production, nor alter the flow path or method of disposal of radioactive waste or byproducts. Therefore the proposed change does not result in a significant change in the types, or significant increase in the amounts, of any effluent that may be released offsite.
3. The proposed change does not involve a physical change to the facility design, configuration, operation, maintenance, or testing. The proposed change is limited to the description of the start signal for the CCW pumps. Therefore the proposed change does not affect individual or cumulative occupational radiation exposure.