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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 HOWE, P.W. Carolina Power & Light Co.
 RECIPI. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Requests relief from requirements of ASME Section XI, 1977
 Edition & Addenda through Summer 1978, IWC-5222(a), "Sys
 Hydrostatic Tests," for steam generator & associated piping
 up to & including first isolation valve.

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Carolina Power & Light Company

JUL 15 1982

Office of Nuclear Reactor Regulation
ATTN: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
United States Nuclear Regulatory Commission
Washington, D.C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
ASME SECTION XI SYSTEM HYDROSTATIC TEST SPECIFIC RELIEF REQUEST

Dear Mr. Varga:

Carolina Power & Light Company (CP&L) submits the following specific relief request in accordance with 10 CFR 50.55a(g)(5)(iii).

Relief is requested on the requirements of ASME Section XI, 1977 Edition and Addenda through Summer 1978, IWC-5222(a), "System Hydrostatic Tests", as they pertain to the H. B. Robinson (HBR) Steam Generators (S/G) and associated piping up to and including the first isolation valve.

In order to satisfy the code requirement which is based on the relief valve setting of 1085 psig, the S/Gs and associated piping must be pressurized to 1356 psig. However, in order to satisfy a vendor recommendation made in 1978 for the HBR S/Gs, the pressure differential between the primary and secondary sides of the S/G must be maintained at or below 200 psig (secondary pressure higher). This restriction is required to preserve the reliability and integrity of the cladding-to-tube sheet bond and to prevent unseating the tapered explosive plugs in use in all three S/Gs. To perform a hydro test which satisfies both the code requirements (1356 psig) and the plant specific limitations (ΔP of 200 psig), a Reactor Coolant System (RCS) pressure of 1156 psig would be required. Using the current HBR Appendix G (heatup/cooldown) curves for the reactor vessel, an RCS pressure of 1156 psig would correspond to a minimum temperature of 395°F. The operation required to attain an RCS pressure of 1156 psig, an RCS temperature of 395°F, and a secondary pressure of 1356 psig would result in violation of Technical Specification 3.4 (Secondary Steam and Power Conversion System). Carolina Power & Light Company believes that the above plant limitations justify an exemption from the pressure requirements of ASME Section XI hydro requirements. Carolina Power & Light Company proposes that an operational leak inspection of the S/Gs and associated piping up to and including the first isolation valve at the no-load condition of approximately 870 psig be performed to meet the intent of Section XI. This inspection, done at the maximum normal operating pressure, will provide adequate assurance of

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continued safe operation of the S/Gs and associated piping. It should be noted that the plant is not expected to operate with these S/Gs through the second ten-year interval since CP&L is scheduled to replace the HBR S/Gs within the very near future. Specifically, new S/Gs are currently on order, and a letter to the NRC describing the replacement was issued on July 1, 1982. With the replacement of the HBR S/Gs, the plant specific pressure limitations (ΔP of 200 psig) will be removed and a full set of pre-operational hydro tests will be performed after installation of the new S/Gs.

In summary, due to the operational limitation on S/G pressure differential recommended by the S/G vendor and current Technical Specification requirements for the Secondary Steam and Power Conversion System, the ASME Section XI specified S/G hydro cannot be performed. An alternative operational leak inspection at no load conditions will be performed to meet the intent of Section XI. In addition, current plans call for replacement of the S/Gs during the next 10-year interval. As a result of this replacement, pre-operational hydros, meeting the requirements of Section XI, will be performed on the S/Gs and associated piping. Carolina Power & Light Company believes that all these factors will assure the integrity of the S/Gs and associated piping for the next 10-year interval.

If you have any questions concerning this request, please contact me.

Yours very truly,



P. W. Howe
Vice President
Technical Services

DCW/ce (325C3T4)

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC-NRR)
Mr. S. Weise (NRC-HBR)