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EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 82-16 re NUREG-0737 Tech Specs, discussing status of items applicable to plant.

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CP&L
Carolina Power & Light Company

December 23, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO GENERIC LETTER NO. 82-16
NUREG 0737 TECHNICAL SPECIFICATIONS

Dear Mr. Eisenhut:

Carolina Power & Light Company (CP&L) has received Generic Letter No. 82-16, NUREG-0737 Technical Specifications, dated September 20, 1982. The staff guidance along with our response, regarding the status of each item applicable to the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2) is as follows:

NRC Staff Guidance

(1) STA Training (I.A.1.1.3)

"Our July 2, 1980 letter provided model TSs for TMI lessons learned Category "A" items. Included were TSs that specified the qualifications, training and on-duty requirements for the Shift Technical Advisors (STA). STA training requirements are under the consideration by the Commission. Further guidance will be provided pending the decision on the requirements by the Commission."

CP&L Response

Application to include the qualification and training requirements for STA's was made on November 5, 1980. Amendment 59 to the HBR2 license was issued on August 24, 1981 and included the qualification and training requirements for STA's. Application to revise the STA requirements will not be considered until the Commission has made their final decision and further guidance is provided.

A046

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NRC Staff Guidance

(2) Limit Overtime (I.A.1.3)

"On June 15, 1982 we transmitted to licensees of operating plants a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In the same letter we also transmitted revised pages of NUREG-0737 (Item I.A.1.3). The administrative section of the technical specification should be revised to require procedures that follow the policy statement guidelines. An acceptable specification would be "the amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12)," or following the model TSs in Enclosure 2."

CP&L Response

In a letter dated February 26, 1981 CP&L submitted the Company's policy regarding nuclear power plant staff working hours. In a letter from Mr. S. A Varga, dated November 5, 1981, the NRC approved CP&L's policy. In Generic Letter 82-92, Nuclear Power Plant Staff working hours, dated February 8, 1982, your staff issued the policy statement regarding this item. The CP&L policy is consistent with the intent of your policy statement. The only difference is that individuals are not permitted to work more than 12 hours strait rather than 16 hours as provided in your policy statement, and they are allowed to work 84 hours in a seven day period rather than 72 hours as provided in your policy statement. Our philosophy is that providing consistent shorter shifts each work day with an additional shift per work period (12 hour days, 7 days a week) is less demanding and induces less fatique than would an erratic cycle which would be allowed by your policy. Generic Letter 82-12, Nuclear Power Plant Staff Working Hours, dated June 15, 1982, provided additional emphasis to your policy, but did not change the specific guidelines. The HBR2 policy remains as approved on November 5, 1981, and is consistent with the intent of the Commission policy as clarified in Generic Letter 82-12. Generic Letter 82-12 also provided clarification to require that licensees of operating plants include provisions governing overtime in Administrative Procedures. Administrative Instruction 4.0, Conduct of Operations, delineates the guidelines for the use of overtime at HBR2.

NRC Staff Guidance

(3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

"The objective of this item is to improve the reliability and performance of the auxiliary feedwater (AFW) system. TSs depend on the results of the licensee's evaluation and the staff review, and are being developed separately for each plant. The limiting conditions of operation (LCO's)

and surveillance requirements for the AFW system should be similar to other safety-related systems".

CP&L Response

Application to amend the existing operability requirements for the AFW system was made on October 1, 1982. The amendment is presently being reviewed by the NRC, and when issued, should satisfy the NRC guidelines. The existing AFW TS surveillance requirements satisfy NRC guidelines.

NRC Staff Guidance

(4) Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)

"The AFW system automatic initiation system was to have been control grade by June 1, 1980 and safety grade by July 1, 1981; the AFW system flow indication was to have been control grade by January 1, 1980 and safety grade by July 1, 1981. The control grade requirement was part of the short term lessons learned activities, and model TSs were included with our July 2, 1980 letter. These TSs are considered adequate as TSs for the safety grade requirement."

CP&L Response

Application to include the operational and surveillance requirements for AFW Initiation was made on November 5, 1980. Amendment 59 to the HBR2 license was approved and issued on August 24, 1981 and included the operational and surveillance requirements for AFW Initiation.

NRC Staff Guidance

(5) Dedicated Hydrogen Penetrations (II.E.4.1)

"Plants that use external recombiners or purge systems for post-accident combustible gas control of the containment atmosphere should provide containment penetrations dedicated to that service. In satisfying this item, some plants may have to add some additional piping and valves. If so, these valves should be subjected to the requirements of Appendix J, and the TSs should be modified accordingly."

CP&L Response

The Dedicated Hydrogen Penetration for HBR2 was provided via an existing containment penetration. No modifications or additional valves are required for the containment penetration; therefore, no valves need to be added to the TSs for Appendix J testing.

NRC Staff Guidance

(6) Containment Pressure Setpoint (II.E.4.2.5)

"The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and we approved their justification by separate correspondence. The remaining plants must submit a change to the TSs with the lower containment pressure setpoint and provide justification if this setpoint is more than 1 psi above maximum expected containment pressure during normal operation.

CP&L Response

In a letter dated December 31, 1980 CP&L provided justification for not changing the setpoint for HBR2. In a letter dated December 21, 1981 Mr. Varga indicated that the HBR2 setpoint was acceptable, therefore, no TS change is required. However, CP&L has discovered an error in the calculation of the containment net free volume used in the FSAR. Subsequently, CP&L has determined that a TS change is required and this TS change will be submitted shortly.

NRC Staff Guidance

(7) Containment Purge Valve (II.E.4.2.6)

"Model TSs are being sent separately to each plant as part of the overall containment purge review. These TSs include the requirement that the containment purge valves be locked closed except for safety-related activities, verified closed at least every 31 days, and be subjected to leakage rate limits."

CP&L Response

The containment purge valves for HBR2 are locked closed with their breakers racked out and cleared. Equipment that is cleared is verified to have the correct status every month by the Shift Foreman. The containment purge valves are continuously monitored for leakage via the Penetration Pressurization System (PPS). Indication for excessive valve leakage would be indicated in the control room via the PPS alarm. Sufficient administrative controls are in effect and enforceable, therefore, no additional guidance is necessary in the TSs.

NRC Staff Guidance

(8) Radiation Signal on Purge Valves (II.E.4.2.7)

"The containment purge valves must close promptly to reduce the amount of radiation released outside containment following a release of radioactive

materials to containment. TSs should include the requirement that at least one radiation monitor that automatically closes the purge valves upon sensing high radiation in the containment atmosphere be operable at all times except cold shutdowns and refueling outages. If not operable, either the plant should begin proceeding to cold shutdown within 24 hours or the purge valves should be closed within 24 hours. Model TSs are provided in Enclosure 2 in Standard Technical Specifications format for those plants that are using safety-grade components to satisfy the requirement."

CP&L Response

Although the containment purge valves are locked closed with their breakers racked out, the respective Radiation Monitors and associated trips are functionally checked every two weeks. These Radiation Monitors are not in the TSs at the present time, but are incorporated in the Radiological Effluent Technical Specification (RETS) which will be submitted to the NRC in the near future.

NRC Staff Guidance

(12) Reporting SV and RV Failures and Challenges (II.K.3.3)

"NUREG-0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of your TSs that discuss reporting requirements should be accordingly changed; model TSs are given in Enclosure 2. Note that an acceptable alternative would be to report challenges monthly."

CP&L Response

The HBR Emergency Response Plan, Section 2.2.2, Emergency Action Levels for an Unusual Event, requires that the failure of a pressurizer safety or relief valve to close be declared an Unusual Event. In accordance with 10CFR50.72, Unusual Events are reported to the NRR via telecon within one hours. Administrative Instruction (AI)-12, Plant Reports, requires that challenges to pressurizer PROV's and safety valves be included in the HBR2 Annual Operating Report. In that the HBR2 TS are incorporated into the plant operating procedures and that they are equally enforceable, it would be unnecessary to provide redundant guidance in the text of the TS.

NRC Staff Guidance

(13) Anticipatory Trip on Turbine Trip (II.K.3.12)

"Licensees with Westinghouse-designed operating plants have confirmed that their plants have an anticipatory reactor trip upon turbine trip. Many of these plants already have this trip in their TSs. For those that

do not, the anticipatory trip should be added to the TSs. Model TSs are included in Enclosure 2 in the format of Standard Technical Specifications."

CP&L Response

In a letter dated June 27, 1980 CP&L informed you that HBR2 has an "at-power" reactor trip for a turbine trip. The surveillance requirements for the turbine trip are included in the TSs. The allowable setpoints for the turbine trip signal for reactor trip is not incorporated in the HBR2 TS, because these setpoints are not used in the transient and accident analysis.

If you have any questions regarding these matters, please contact a member of our Licensing Staff.

Yours very truly,

S. R. Zimmerman
Manager
Licensing & Permits

SRZ/kjr (5928C10T4)

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