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Region 2, Ofc of the Director

SUBJECT: Requests enforcement discretion re one time 30 h extension to cold shutdown action statement of Tech Spec 3.0.

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Incident 4

Carolina Power & Light Company

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OCT 28 1988

Robinson File No: 13510C

Serial: RNPD/88-5212

Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REQUEST FOR ENFORCEMENT DISCRETION

Gentlemen:

As discussed in a conference call at 1415 hours on October 28, 1988, between members of my staff, NRC Region II and NRR personnel, Carolina Power and Light Company has requested a one time 30 hour extension to the cold shutdown action statement in the H. B. Robinson Unit No. 2 Technical Specification 3.0. This extension would enable CP&L to complete repairs needed to provide qualified cable splices on the four containment fan cooler units (HVH-1 through HVH-4) without taking the plant to cold shutdown conditions.

At 2220 hours on October 27, 1988, with the plant at 91% power, all four HVH units were declared inoperable due to a non-environmentally qualified penetration-to-pigtail splice configuration for the 480 volt power supply to each unit. This condition was discovered through an on-going programmatic assessment of plant components in the EQ Program to ensure compliance with the environmental qualification requirements of 10CFR50.49.

Technical Specification 3.3.2.1.c states that the reactor shall not be made critical unless four HVH units are operable. Technical Specification 3.3.2.2.a states that, if one HVH unit becomes inoperable during normal operation, the reactor may remain in operation for twenty-four hours, provided both containment spray pumps are demonstrated to be operable. Technical Specification 3.0 states that, for circumstances in excess of those addressed in the specification, the unit shall be placed in hot shutdown within eight hours and in cold shutdown within the next 30 hours. Therefore, with all four HVH units declared inoperable, Technical Specification 3.0 was invoked. The reactor was taken to hot shutdown at 0203 hours on October 28, 1988. Repair planning was immediately initiated, and there is a high probability that repairs will be completed within a reasonably short period of time.

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Since the repairs are expected to be completed with reasonable assurance of success within the approximate time frame of a plant cooldown, it was determined to request this extension to preclude initiating cooldown to cold shutdown condition for the following reasons:

I. Safety Impact

- An unnecessary cooldown within the time frame of a plant cooldown, would result in a needless thermal transient on the plant.
- Startup from cold shutdown would generate in excess of 40,000 gallons of contaminated water (dilution from cold shutdown boron concentration and heatup).
- At the time this condition was discovered, the plant was operating at 91% steady state power versus 100% steady state power. This reduces power history with regard to any transient event.
- The plant has been in hot shutdown condition since 0203 hours on October 28, 1988, and has been borated to hot shutdown boron concentration making any Xenon in the core conservative negative reactivity.
- Although all four HVH units are declared inoperable, and repairs could be performed simultaneously on all units, it was determined as a prudent measure to affect repairs on only two units at a time leaving one HVH unit operating on each emergency bus.
- An assessment was conducted considering availability of one containment spray pump and only one HVH unit while conducting repairs assuming loss of one emergency bus. Due primarily to the significantly reduced energy source while at hot shutdown the lack of a second HVH unit is more then compensated for. Therefore in our best engineering judgement the consequences of this configuration are believed bounded by existing analyses.
- Both containment spray pumps were demonstrated operable.

II. Plant Impact

- Some additional personnel radiation exposure would be incurred due to required surveillance tests performed solely for the cooldown and heatup.
- Cold shutdown could result in a delay of up to four days to return Robinson Unit 2 to service.

- As a preventive measure based on previous cold shutdown cycles, taking the plant to cold shutdown this time would require replacing the pressurizer manway cover gasket, which will include additional exposure during this forced outage and additional time for Reactor Coolant System degassification in order to open the primary system.

Since there is a high level of confidence that repairs will be successful and the potential benefits of precluding an unnecessary cooldown are significant, it is believed that this approach is justified as the most expeditious to restore HVH unit operability while having the least safety and physical impact on the plant.

If you have any questions regarding this request, please contact Mr. J. M. Curley at (803) 383-1367.

Very truly yours,

R. E. Morgan
General Manager

RDC:dwm

cc: L. W. Garner
R. Lo
NRC Document Control Desk