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 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
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 DIETZ,C.R. Carolina Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 GRACE,J.N. Region 2, Ofc of the Director

SUBJECT: Discuss request for discretionary enforcement & 880922  
 telcon request for one-time 12 h extension to Tech Specs.

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J. N. Grace  
Regional Administrator  
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Region II  
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H. B. ROBINSON UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
REQUEST FOR DISCRETIONARY ENFORCEMENT

Dear Dr. Grace:

As discussed in a conference call at 1500 hours on September 22, 1988 between members of my staff, NRC Region II and NRR personnel, Carolina Power & Light Company has requested a one time twelve (12) hour extension to the action statement in H. B. Robinson Unit No. 2 Technical Specification 3.6.3.d. This extension would enable CP&L to complete repairs needed to correct the seat leakage problems on the containment purge exhaust inner and outer isolation valves (V12-9 and V12-8) without having to initiate a cooldown to cold shutdown conditions.

At 0320 hours on September 22, 1988, with the plant at 89% power, seat leakage was identified on the outer purge exhaust containment isolation valve V12-8 resulting in the valve being declared inoperable. The containment purge system had been in operation the day before and the Penetration Pressurization System (PPS) had never fully pressurized the penetration inner space (between V12-9 and V12-8) which prompted an investigation. Technical Specification 3.6.3 requires the inoperable valve to be returned to operable status or the affected penetration be isolated within four (4) hours or the plant be in cold shutdown within 36 hours. While leak testing the inner purge exhaust isolation valve (V12-9) in order to verify isolation of the penetration, V12-9 was noted also to be experiencing seat leakage. Being unable to eliminate seat leakage on either valve, and conservatively assuming that the leakage might represent uncontrolled containment leakage in excess of Technical Specification 4.4, the reactor was taken to hot shutdown at 1154 hours that morning. Repairs were immediately initiated and were expected to be completed within approximately twelve (12) hours. An Unusual Event was declared at 0721 since the four hour action statement of Technical Specification 3.6.3 could not be satisfied.

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Since the repairs were expected to be completed with reasonable assurance of success, it was determined to request this extension to preclude initiating cooldown to cold shutdown condition for the following reasons:-

- Although not required by Technical Specifications, the two valves are being repaired in series to insure that at least one valve is closed as an additional assurance to public health and safety. This may necessarily increase the maintenance time required prior to satisfying LCO action statements requiring cold shutdown.
- An unnecessary 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).
- 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.
- A twelve hour delay in reaching cold shutdown, if repairs were unsuccessful, would result in minimal impact on safety since seat leakage is minimal and the reactor would have been shutdown for at least 28 hours.

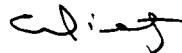
Since there was a high level of confidence that repairs would be successful and the potential benefit of delaying the initiation of cooldown were significant it is believed that this request is justified.

As a matter of information the outlet purge exhaust valve (V12-8) was repaired, tested and the penetration isolated at 2145 on September 22, 1988. All Technical Specification action statements had at that time been satisfied and the Unusual Event was terminated.

Current plans are to complete current maintenance activities and return Robinson Unit 2 to service.

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

Very truly yours,



Charles R. Dietz  
Manager

Robinson Nuclear Project Department

JMC:kbw

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