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VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Application to amend License DPR-23 revising Tech Specs re ASME Section XI surveillance requirements for inservice insp & testing activities.

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OCT 24 1983

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
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
REQUEST FOR LICENSE AMENDMENT
SURVEILLANCE REQUIREMENTS

Dear Mr. Varga:

Summary

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2). These revisions incorporate Section 4.0.5 of the Westinghouse Standard Technical Specifications (STS) regarding ASME Section XI surveillance requirements, delete existing detailed surveillance requirements which are covered by ASME Section XI, and make administrative changes to the affected pages. By letter dated May 10, 1977, CP&L requested a similar change to the same section of the TS. The change was never approved or issued by NRC. This submittal completely supersedes CP&L's letter dated May 10, 1977.

Details

The present HBR2 TS include many detailed surveillance requirements that are now specified in Section XI of the ASME Boiler and Pressure Vessel Code for inservice inspection and testing activities. At the recommendation of the NRC staff members, we have reviewed the HBR2 TS and have developed revisions to the affected pages in order to delete the redundancy between ASME Section XI requirements and the present HBR2 TS. Only two items in the present TS, examination of the pressurizer and steam generator cladding (2.7 and 3.8, respectively) are not required by ASME Section XI. Since they are not required by current regulations, and conducting the surveillances results in high exposure levels, these two items are not included in the proposed TS attached. Pages 4.1-1 through 4.2-25 and 4.5-2 through 4.5-6 will be replaced by the attached pages 4.1-1 through 4.2-9 and 4.5-2 through 4.5-4, respectively.

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In addition to the revisions concerning ASME Section XI surveillance requirements discussed above, the following administrative changes to the affected pages are requested.

The Turbine Trip Set Point, listed as Item 22 in Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, was defined as a stop valve closure or low EH fluid pressure. The table has been revised to clarify the set point as being a stop valve closure or low auto-stop oil pressure.

Emergency Plant Portable Survey Instruments, listed as Item 26 in Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, has been deleted. The requirements for these instruments are addressed in Section 6.3.1 of the Emergency Plan and plant procedure RST-003, "Emergency Kit Inventory."

By letter dated February 22, 1982, CP&L requested that a new item, Noble Gas Effluent Monitors, be added to Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels. This change has not yet been approved or issued by NRC. Therefore, in order to preserve the numbering system used in our previous request, Item 38 on the attached Table 4.1-1 has been marked as pending to allow for future insertion of the Noble Gas Effluent Monitors. The table then continues with Items 39 and 40 as discussed below.

As a result of discussions with NRC Region II personnel, we have included steam flow/feedwater flow mismatch in coincidence with low steam generator water level in the TS. Tables 3.5-2 and 4.1-1 have been revised accordingly by the addition of Items 16 & 17 and 39 & 40, respectively.

Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, has been revised to reflect the test frequency for startup (S/U). The phrase "if not performed in the previous seven (7) days" was part of the definition of startup until Amendment 65 when the surveillance frequency notations were revised, and this phrase was inadvertently omitted.

The laboratory testing criteria stated in Item 14 of Table 4.1-3, Frequencies for Equipment Tests, conflicts with that in Section 4.15.1.d for the charcoal in the Control Room's heating, ventilation, and exhaust system (HVE-19). When the Technical Specifications were changed (Amendment No. 45) to reflect an upgrade in HVE-19's testing requirements due to the uprating of the unit's power level, two new sections were added to the Technical Specifications. These sections, 3.15 and 4.15, stated that the charcoal would be subjected to a methyl iodide removal test ($\geq$ 90% efficient) in accordance with the ANSI/ASME N509-1976 standard. This approach was found to be acceptable to the Nuclear Regulatory Commission via their December 5, 1979 Safety Evaluation concerning this change. The testing requirement for HVE-19 is therefore being removed from Table 4.1-3 since it is now discussed in detail in Section 4.15.

A safety analysis and significant hazards analysis were performed for each of the requested revisions. A summary of each is attached. As a result, CP&L has determined that these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident from any previously evaluated, or involve a significant reduction in a margin of safety.

Administrative

Carolina Power & Light Company is planning to follow the revised ASME Section XI surveillance program discussed herein during the upcoming refueling outage which is scheduled to begin in late 1983. Therefore, CP&L requests your approval of these changes by December 9, 1983.

The affected pages are enclosed for your review. Changes are indicated by vertical lines in the right hand margin.

In accordance with 10 CFR 170.22, we have determined that this revision constitutes a Class III Amendment. Accordingly, our check for $4,000.00 is enclosed.

Should you have any questions regarding this matter, please contact a member of the Nuclear Licensing Staff.

Yours very truly,

M. A. McDuffie
Senior Vice President
Nuclear Generation

ONH/ccc (7707ONH)
Attachments

cc: Attorney General (SC)
Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Heyward G. Shealy (SC)
Mr. Steve Weise (NRC-HBR)

M. A. McDuffie, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge, and belief; and that the sources of his information are officers and employees of Carolina Power & Light Company.

Franklin Murray
Notary (Seal)

My commission expires: OCT 04 1986

FRANKLIN MURRAY NOTARY PUBLIC WAKE COUNTY, N. C.