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VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Application for amend to License DPR-23 revising Tech Specs 3.1,1.4,Table 3.5-5 & Table 4.1-1,in response to Generic Ltr 83-37 re NUREG-0737,Items II.B.1,II,B.3,II.E.1.1,II.F.1.1, II.F.1.2,II.F.1.3,II.F.1.4,II.F.1.5 & II.F.1.6.

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CP&L
Carolina Power & Light Company

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FEB 7 1984

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
NUREG-0737 TECHNICAL SPECIFICATIONS
GENERIC LETTER NO. 83-37

Dear Mr. Varga:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 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 are in response to Generic Letter No. 83-37 (GL 83-37), "NUREG-0737 Technical Specifications."

DETAILS

Enclosure 1 of GL 83-37 listed eleven NUREG-0737 items for which TS were requested. Each of these items is discussed individually in Attachment 1 to this letter. Attachment 2 contains the revised TS pages.

In addition, CP&L hereby requests withdrawal of our February 22, 1982 submittal concerning noble gas effluent monitors. Part of that submittal was included in our Radiological Effluent Technical Specification letter dated October 25, 1983. The remainder is included in the proposed TS pages attached.

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revisions involve no significant hazards considerations because the proposed changes add requirements not currently included in the TS. The commission has provided guidance concerning the

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application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change that constitutes an additional limitation, restriction, or control not presently included in the TS; for example, a more stringent surveillance requirement. The attached proposed changes fall within the Commission's example (ii) of a change not likely to involve a significant hazards consideration.

ADMINISTRATIVE

Since these revisions are requested by the Nuclear Regulatory Commission through GL 83-37, it is CP&L's understanding that no license fee is required.

The affected pages are included in Attachment 2 for your use. Changes are denoted by vertical bars in the right margin.

If you have any questions regarding this subject, please contact a member of our Nuclear Licensing staff.

Yours very truly,

M. A. McDuffie
Senior Vice President
Nuclear Generation

ONH/lcv (9398ONH)
Attachments

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 the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Lisa M. Randall
Notary (Seal)

LISA RANDALL NOTARY PUBLIC WAKE COUNTY, N.C.

My commission expires: 5/18/88

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

TECHNICAL SPECIFICATIONS FOR NUREG-0737

(1) Reactor Coolant System (RCS) Vents (II.B.1)

Proposed TS for RCS vents are included in Attachment 2. This system will be operational at HBR2 by startup after the Steam Generator (S/G) Replacement Outage which is currently scheduled to begin in July 1984. If these TS are approved prior to then, it is requested that implementation not be required until startup after the S/G Replacement Outage.

Affected Page Attached: 3.1-2a

(2) Post Accident Sampling (II.B.3)

An administrative program for the Post Accident Sampling System (PASS), including: (1) training of personnel, (2) procedures for sampling and analysis, and (3) provisions for maintenance of sampling and analysis equipment, is included in the Plant Operating Manual (POM) for HBR2. The guidance of GL 83-37 stated that it would be acceptable to reference this program in the administrative controls section of the TS. The custom TS for HBR2, however, do not use Section 6.8, Procedures and Programs. Carolina Power & Light Company, therefore, does not plan to submit TS for the PASS. We believe that the HBR2 POM provides adequate documentation of the PASS administrative program, and it is not necessary to reference it in the TS.

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

Technical Specifications for the Auxiliary Feedwater System (AFWS) are already included in the HBR2 TS in Sections 3.4 and 4.8.

(4) Noble Gas Effluent Monitors (II.F.1.1)

Technical Specifications for the Noble Gas Effluent Monitors are included in the proposed Radiological Effluent TS for HBR2 submitted on October 25, 1983 in Tables 3.5-7 and 4.18-2 and in the attached Tables 3.5-5 and 4.1-1.

It should be noted that the Noble Gas Effluent Monitors at HBR2 are of two types: GM and CaF_2 Scintillators. These monitors will be calibrated with a Cs-137 source as opposed to the Xe-133 or Sr-90 source recommended in NUREG-0737. Both types of detector systems will have a complete electronic calibration. The detector systems will be removed from their normal location and calibrated in the on-site calibration facility. A three point source calibration will be performed. Prior to returning the GM detectors to their normal locations, the check source will be activated and the indications will be recorded. Following installation of the GM detectors, the check sources will again be activated and the indications will be recorded. If the non-in-situ and in-situ indications vary by less than 20%, the GM detector systems are considered properly calibrated.

Prior to returning the CaF_2 Scintillators to their normal locations, they will be exposed to a portable check source and the indications recorded. Following installation of the scintillators, they will be again exposed to the portable check source and the indications will be recorded. If the non-in-situ and in-situ indications vary by less than 40%, the scintillator detector systems are considered properly calibrated.

These two detector types will also have a continuous display in mR/hr as opposed to equivalent Xe-133 concentrations or as opposed to μ Ci/cc of noble gas. However, curves are used which convert mR/hr to noble gas concentrations in μ Ci/cc.

Affected Pages Attached: 3.5-13
4.1-6a

(5) Sampling and Analysis of Plant Effluents (II.F.1.2)

This item is covered in part in Section 4.18 of the current HBR2 TS and in Table 3.5-7 of the proposed Radiological Effluent TS for HBR2 which was submitted on October 25, 1983. In addition, the administrative program, including training and procedures, is covered in the HBR2 POM.

(6) Containment High-Range Radiation Monitor (II.F.1.3)

Proposed TS for the Containment High Range Radiation Monitor are included in Attachment 2.

Affected Pages Attached: 3.5-13
4.1-6b

(7) Containment Pressure Monitor (II.F.1.4)

Proposed TS for the Containment Pressure Monitor are included in Attachment 2.

Affected Pages: 3.5-13
4.1-6b

(8) Containment Water Level Monitor (II.F.1.5)

Proposed TS for the Containment Water Level Monitor are included in Attachment 2.

Affected Pages: 3.5-13
4.1-6b

(9) Containment Hydrogen Monitor (II.F.1.6)

Proposed TS for the Containment Hydrogen Monitor are provided in Attachment 2.

Affected Pages: 3.5-13
4.1-6b

(10) Instrumentation for Detection of Inadequate Core Cooling (II.F.2)

Technical Specifications for the Reactor Coolant System Subcooling Monitor are already included in the HBR2 TS in Tables 3.5-5 and 4.1-1.

Carolina Power & Light Company will complete installation of the Reactor Vessel Level Instrumentation System (RVLIS) at HBR2 during the Steam Generation Replacement Outage which is currently scheduled to begin in July 1984. Therefore, TS for this item will be submitted by three months prior to the end of that outage so that they can be approved and implemented by startup.

(11) Control Room Habitability Requirements (II.F.2)

As stated in our letter of June 2, 1983 concerning Control Room Habitability, CP&L is conducting a survey of a nearby highway to determine what, if any, toxic chemicals are trucked over that highway. The survey and evaluation of toxic chemicals is scheduled to be completed by the end of 1984. At that time, CP&L will determine if there is a need to provide gas detectors for the Control Room. If so, CP&L will then provide TS on an appropriate time schedule, commensurate with installation of the detectors.