

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8407240193 DOC. DATE: 84/07/17 NOTARIZED: YES DOCKET #
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME: AUTHOR AFFILIATION
 CUTTER, A.B. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Application to amend License DPR-23, revising Tech Specs to
 allow use of integrated leak rate test duration criteria in
 ANSI N45.4-1972.

DISTRIBUTION CODE: A017S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 1+6
 TITLE: OR Submittal: Append J Containment Leak Rate Testing

NOTES:

05000261

OL: 07/31/70

	RECIPIENT ID CODE/NAME		COPIES LTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTR ENCL
	NRR ORB1 BC 01		7	7			
INTERNAL:	ELD/HDS1 08		1	1	NRR/DSI/ASB		1 1
	NRR/DSI/CSB 06		1	1	REG FILE	04	1 1
	RGN2		1	1			
EXTERNAL:	ACRS 07	10	10		LPDR 03		1 1
	NRC PDR 02		1	1	NSIC 05		1 1
	NTIS		1	1			

Rec'd w/cheek \$150.00



Carolina Power & Light Company

SERIAL: NLS-84-211

JUL 17 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
INTEGRATED LEAKAGE RATE TEST DURATION

Dear Mr. Varga:

SUMMARY

In accordance with 10 CFR 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 would allow use of the integrated leak rate test (ILRT) duration criteria contained in ANSI N45.4-1972. This standard is referenced by 10 CFR 50 Appendix J for technical guidance to be used during the performance of ILRTs.

DETAILS

Appendix J of 10 CFR 50 requires use of the test method described in ANSI N45.4-1972, "Leakage Rate Testing of Containment Structures for Nuclear Reactors", for containment ILRTs. Normally, such tests are of 24-hour duration. However, Section 7.6 of ANSI N45.4-1972 allows for a shorter test period provided "it can be demonstrated . . . that the leakage rate can be accurately determined during a shorter test period."

As indicated in EPRI NP-2726 "Containment Integrated Leak Rate Test Improvements", the NRC staff has approved a shorter duration test provided that the provisions within Bechtel Topical Report BN-TOP-1 are met. The NRC approval of BN-TOP-1 may be found in the attached February 1, 1973 letter from R. C. DeYoung, Assistant Director for Pressurized Water Reactors, Directorate of Licensing, to R. D. Allen, Vice President, Bechtel Corporation. Specific approval has been granted for shorter duration testing at several sites, including CP&L's Brunswick plant. Should a shortened test duration be attempted, Carolina Power & Light Company proposes to use the criteria contained in Section 2.0 of BN-TOP-1 to judge the test acceptable. In addition to the Section 2.0 of BN-TOP-1 criteria, the mass point method of analysis will also be used.

8407240193 840717
PDR ADOCK 05000261
P PDR

AO17
1/1
Rec'd w/letter 8/15/84

SIGNIFICANT HAZARDS DETERMINATION

Based on the above considerations, CP&L has determined that the proposed TS revisions involve no significant hazards considerations. The Commission has provided guidance concerning the 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). The attached proposed changes fall within NRC's example (iv), a relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. In this case, the 24 hour test duration specified in HBR2 TS has no engineering, scientific, or legal basis (EPRI NP-2726, p. 3-32). The criteria contained in Section 2.0 of BN-TOP-1 that would be used to judge a shortened test acceptable has been determined to be the current industry standard and has been demonstrated to be generically acceptable.

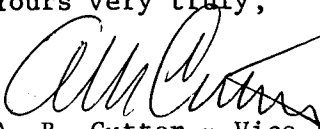
ADMINISTRATIVE

The affected TS pages are attached for your use. Changes are denoted by vertical bars in the right margin.

In accordance with 10 CFR 170.12, a check in the amount of one hundred and fifty dollars (\$150.00) in payment of a license amendment application fee is attached.

If you have any questions concerning this request, please contact Mr. Sherwood Zimmerman of our Nuclear Licensing staff.

Yours very truly,


A. B. Cutter - Vice President
Nuclear Engineering & Licensing

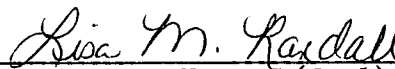
ABC/CGL/ccc (015CGL)

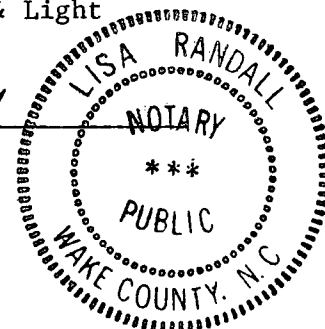
Attachments

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

A. B. Cutter, 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.

My commission expires: 5/8/8


Notary (Seal)



ATTACHMENT 1