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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
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 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Supplemental application for amend to License DPR-23,
 changing Tech Specs re operational & surveillance
 requirements to control offsite releases associated w/use of
 containment purge & vent sys.

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Carolina Power & Light Company

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SERIAL: NLS-86-221
NRC TAC NO.: 52697

Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing - A
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
CONTAINMENT VENTING AND PURGING

Dear Mr. Rubenstein:

SUMMARY

By letter dated December 11, 1985 and revised on May 1, 1986, Carolina Power & Light Company (CP&L) submitted a Technical Specification (TS) amendment request concerning operational and surveillance requirements for the containment purge supply and exhaust isolation valves at the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2). In response to NRC comments generated during review of that request, CP&L hereby submits the enclosed revision to that amendment request. This letter replaces the previous request in its entirety and is submitted in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101.

DISCUSSION

This change request would impose operational and surveillance TS requirements which provide greater assurance of the plant's ability to adequately control potential off-site releases associated with the use of the containment purge and vent system. Analysis has shown that the 42-inch purge system valves must be capable of closure within two seconds under LOCA conditions in order to prevent excessive off-site exposure. These valves have been analyzed and have demonstrated the capability to achieve this criteria when modified as discussed below.

The outboard valves are installed in a conventional orientation and are capable of two second closure under LOCA conditions from the fully open (90°) position. However, to facilitate maintenance, the inboard valves have been installed in a reverse orientation. To assure proper valve closure under these reverse flow dynamic conditions, the valves have been modified to prevent actuation beyond 70° open. This configuration has demonstrated acceptable performance under dynamic LOCA conditions for valves installed in the reverse orientation. Per NRC request, this information has been included in the Basis to Section 3.6.

Section 3.6.4.1 has been added to restrict the use of the valves to "safety related" purposes. Further description as to what constitutes safety related reasons has been added to the Basis.

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Section 3.6.4.2 has been added to prohibit simultaneous use of the 42-inch Purge Supply and Exhaust Valves in conjunction with the 6-inch Pressure and Vacuum Relief Valves when the reactor coolant system is above 200°F.

Section 3.6.4.3 has been added to identify that the functional testing requirements for these valves are covered under the Robinson plant IST Program. This program imposes testing in accordance with ASME Section XI with the appropriate closure time verification. The 6-inch Pressure Relief Valves are tested on a quarterly basis while the 6-inch Vacuum Relief Valve testing is a cold shutdown requirement. This section also provides conditional relief from the IST quarterly testing for the 42-inch Purge Supply and Exhaust Isolation Valves when the valves are not used.

Leakage through these valves is adequately addressed by existing administrative and TS controls. Leakage for the Containment Purge Supply and Exhaust Isolation Valves (42-inch) and the Pressure and Vacuum Relief Valves (6-inch) is continuously monitored by the Penetration Pressurization System (PPS) when the valves are closed. Specific administrative controls require that a maximum allowable flow limit is measured by the PPS during power operation. If during power operation the flow rate is exceeded, TS Section 4.4.1, Operational Leakage Rate Tests, must be adhered to. Specifically, if the leakage exceeds 30 percent of L_p , repairs and retest shall be performed (Sensitive Leak Rate Test (SLRT) Section 4.4.1.2).

SIGNIFICANT HAZARDS

Carolina Power & Light Company has reviewed this amendment request in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed change would involve no significant hazards consideration. This involved an evaluation of the proposed change with respect to the criteria restated below.

A proposed amendment to an operating license...involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

- (1) *involve a significant increase in the probability or consequences of an accident previously evaluated; or*
- (2) *create the possibility of a new or different kind of accident from any accident previously evaluated; or*
- (3) *involve a significant reduction in a margin of safety.*

Carolina Power & Light Company has determined that:

- (1) The requested amendment does not involve a significant increase in the probability or consequences of a previously evaluated accident because the change would add requirements and surveillances which provide greater assurance that the purge valves can perform their isolation function within the response time assumed in the Emergency Core Cooling Analysis. Thus, the change would help ensure that the plant was capable of mitigating the consequences of any related accidents.

In addition, Basis of Section 3.6 provides guidance as to what constitutes justifiable cause for opening these valves under normal plant operation. Since TS guidance in this area did not previously exist, this is considered to provide

greater control in this area and therefore could not adversely affect any of the stated criteria.

- (2) The requested amendment does not create the possibility of a new or different kind of accident than previously evaluated because the change does not affect any equipment, systems, operating parameters, or procedures which could change the operation of the plant. The change merely imposes requirements to verify operability of the affected valves and take conservative action when these operating criteria cannot be verified.
- (3) The requested amendment does not involve a significant reduction in a margin of safety because no existing requirements or limitations are in any way relaxed or superseded.

To further substantiate this no significant hazards conclusion, CP&L has reviewed the guidance provided by "Example of Amendments Considered Not Likely to Involve Significant Hazards Consideration," as published in the Federal Register (48 FR 14864). This requested change is comparable to example (ii) of that NRC guidance which provides that a change would likely be found to involve no significant hazards consideration if it "constitutes an additional limitation, restriction, or control not presently included in the TS."

ADMINISTRATIVE

The revised version of the TS pages affected by this request are included as an enclosure for your use.

Since the original submittal of this TS change (June 20, 1980) included a \$4000 check in payment of a processing fee, the \$150 amendment application fee routinely provided in accordance with 10 CFR 170.12 has not been included with this submittal.

If you have any questions concerning this request, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,



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

ABC/MDM/ccj (3972MDM)
Enclosure

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)
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: 11/27/89


Notary (Seal)

