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SUBJECT: Application for amend to License DPR-23,adding clarifying
 note re Item 27 on Table 4.1-1, "Logic Channel Testing."

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MAY 25 1990

R. A. WATSON
Senior Vice President
Nuclear Generation

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT - REACTOR TRIP SYSTEM LOGIC

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2.

The proposed change adds a clarifying note regarding item 27 on Table 4.1-1, "Logic Channel Testing," and is administrative in nature. The note specifies that testing for the source range channels shall only be required prior to reactor startup if the test was not performed within the previous seven days. The proposed change assures that surveillance testing of the source range logic is required only when the instrumentation which may activate that logic is required operable and explicitly documents the required testing frequency for the source range logic. The amendment also corrects a typographical error and renumbers a subsequent note on Table 4.1-1.

This amendment is required since the TS, as currently worded, has been interpreted to require testing of the source range trip logic on a monthly interval. Testing at power was not intended by the equipment manufacturer and the equipment was not designed for testing at power. This logic has not been tested at power since the plant was licensed. Testing at power is contrary to accepted practice and is potentially unsafe. CP&L requests an NRR waiver of compliance be granted if this request is not processed prior to the expiration of the present monthly interval on June 18, 1990. A discussion of the safety significance of this situation is contained in the Supporting Analysis/Safety Analysis attached.

Exigent handling is requested for this amendment. The situation which requires this amendment was discovered by CP&L on March 2, 1990, and reported in LER 90-005 dated April 2, 1990. Subsequent discussions with NRC, culminating on May 16, 1990, concluded that a TS change was necessary. This situation results from a TS which does not explicitly obviate testing of the source range channels during power operations. Table 4.1-1, item 27, requires logic channel testing monthly; however, it does not specifically exclude source range channels. Table 4.1-1, item 3, requires a channel check once per

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shift and testing prior to each startup for the source range channels. Further, the basis to TS 2.3 states: "The source and intermediate range reactor trips do not appear in the specification, as these settings are not used in the transient and accident analysis (FSAR Section 15). Both trips provide protection during reactor startup." This statement is consistent with Table 4.1-1, item 3, and with the proposed amendment. The proposed change is administrative in nature and not a safety significant revision to the TS. The source range logic channel test was performed during a shutdown on May 19, 1990, and the next test will be required by June 18, 1990. If the allowed grace period is used, the next test will be required by June 25, 1990. Exigent handling and/or a waiver of compliance is needed to avoid shutting down to test the source range logic channel.

SIGNIFICANT HAZARDS ANALYSIS

Carolina Power & Light Company has reviewed the subject TS change request in accordance with the standards set forth in 10CFR50.92 and determined that this change does not constitute a significant hazard based upon the following considerations:

1. Operation of the facility, in accordance with the proposed amendment, would not involve a significant increase in the probability or consequences of an accident previously analyzed because previously evaluated accidents, as found in Chapter 15 of the UFSAR, do not discuss nor take credit for the source range trip feature. Also, the proposed amendment does not introduce any new evolution or test, and cannot increase the probability or consequences of occurrence of any accident previously evaluated.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment is administrative and does not create any new tests, evolutions, or requirements. The amendment clarifies existing logic channel testing requirements and provides consistency with existing requirements for testing of nuclear source range channels. The source range instrument is deenergized during power operations, and no credit for the source range trip feature is taken in the UFSAR accident analysis. Therefore, this amendment will not create the possibility of a new kind of accident from any accident previously evaluated. The affected components will be available and will be verified operable prior to being required for service consistent with the intent of the Technical Specification prior to the proposed amendment. Therefore, this amendment does not create the possibility of a different kind of accident from any accident previously evaluated.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety. The source range channel testing requirements will be made consistent by this amendment. These channels, including the logic channel portions, will be tested and verified operable prior to being required for

service. The proposed amendment is administrative in nature and does not involve a safety-significant change to the Technical Specifications. Therefore, this amendment will not affect the margin of safety.

ADMINISTRATIVE

The TS pages reflecting the change are provided for your use; changes are indicated by a single bar in the right margin.

If you have any questions concerning this request, please contact Mr. L. I. Loflin at (919) 546-6242.

Yours very truly,

R A Watson
R. A. Watson

JSK/ecc (716ECC)
Enclosures

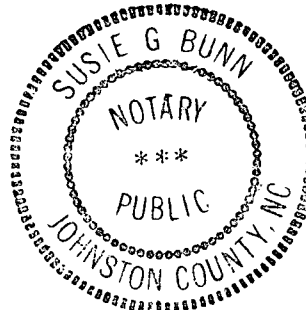
cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

R. A. Watson, 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.

Susie G. Bunn

Notary (Seal)

My commission expires: 3/28/92



ENCLOSURE 1

SUPPORTING ANALYSES/SAFETY ANALYSES

The intent of the proposed amendment is to clarify Item 27 of Table 4.1-1 and to revise the specific wording of this requirement to be consistent with its intent. This amendment will also correct inconsistencies between Item 27 and Item 3 of Table 4.1-1. As such, the proposed amendment is considered an administrative change, and does not constitute a safety-significant revision to the Technical Specifications. In support of this conclusion, the following key points are provided:

- Technical Specification 3.5.1.2 states in part that "... in the event of a subsystem instrumentation channel failure, plant operation at rated power shall be permitted to continue in accordance with Table 3.5-2." Table 3.5-2 states "when one of two intermediate range channels is greater than 1E-10 amps" the Minimum Channels Operable (MCO) requirements do not apply for the source range. Therefore, the source range channels are not required to be operable at elevated power levels.
- Technical Specification 4.1.1 states that "calibration, testing, and checking of instrumentation channels shall be performed as specified in Table 4.1-1." Item 3 within Table 4.1-1 addresses testing requirements for the source range channels. These channels are only required to be tested "prior to each reactor startup if not [tested] in the previous seven (7) days."
- Technical Specification Table 4.1-1, Item 27, states only that "Logic Channel Testing" will be performed monthly which clearly lacks specificity. The consistent and appropriate application of the "Logic Channel Testing" requirement is to apply it to only those logic channels for which the instrumentation that provides input to the logic is required to be operable. To do otherwise means that logic channels must be operable when the instrumentation supporting the logic is not required to be operable and is inconsistent with the definition of operability.
- Technical Specification 1.3 states that "a system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s)." Tests for operability of "partial" trains for devices, when other integral portions of that same train or device are not required operable, is not considered to be a requirement of the Technical Specifications.
- Testing of the source range reactor trip logic with the unit at power was not intended by the equipment manufacturer and, therefore, was not likely to have been considered during development of the Technical Specifications. To physically accomplish this test, a jumper would need to be used. Installation of this jumper, which would prevent high voltage from being applied to the source range detectors, would be intended to preclude possible damage or destruction of these detectors. Any use of these devices is contrary to the accepted standard that surveillance testing should not require the routine use of jumpers or lifted leads.

- The basis section of Technical Specification 2.3 states: "The source and intermediate range reactor trips do not appear in the specification, as these settings are not used in the transient and accident analysis (FSAR Section 15). Both trips provide protection during reactor startup." This statement is consistent with the instrumentation surveillance requirements discussed above for the source range channels and provides insight into the thought process behind these specifications.

Based on the above, the proposed amendment is considered to be an administrative change and does not alter the original intent or the specification. This change is not considered to be a safety-significant revision to the Technical Specifications.

Two additional administrative changes are required. These changes correct an apparent typographical error in the Remarks column of Table 4.1-1 for Item No. 27 Remark (1) and to renumber the existing Remark (2) for Item No. 30. The following addresses the proposed changes as they are listed on the proposed TS page.

Remark No. (1), Item No. 27, Table 4.1-1 which reads as follows:

". . . beyond one month, test test shall be performed . . ." should be revised to ". . . beyond one month, this test shall be performed . . ." This is clearly a typographical change and is solely administrative.

To be consistent with the numbering of remarks elsewhere in Table 4.1-1, Remark No. (2) under Item No. 30 is revised to Remark No. (1). This is also considered to be a correction of a typographical error.

ENCLOSURE 2

REQUEST FOR WAIVER OF COMPLIANCE

This request for a waiver of compliance is supported by addressing the criteria contained in a memo from the Director of the Office of Nuclear Reactor Regulation to Regional Administrators dated February 22, 1990:

1. Nature of the Waiver

Waiver is requested of the requirement in HBR2 TS Table 4.1-1, item 27, which has been interpreted as requiring monthly testing of the source range high flux reactor trip logic channel.

2. Circumstances Requiring Waiver

The situation requiring this request arises from Technical Specification which is not sufficiently explicit to preclude the source range channel from testing on a monthly basis. This situation is discussed in the cover letter.

3. Compensatory Actions

Without a waiver of compliance or a technical specification change, CP&L could be required to shutdown HBR2 to safely perform the source range channel testing.

4. Safety Significance

The proposed amendment is administrative and does not constitute a safety significant change to the TS as discussed in the cover letter and safety analysis.

5. Duration of Waiver

The waiver is requested for a duration which will expire when the TS relief is granted. This is appropriate since testing of the source range channel may damage the equipment when performed at power. The source range detectors are only used during startup operations, below the power range. Thus, not performing the test during the monthly intervals when at power will not have any detrimental effect on operations or the public health and safety.

6. Significant Hazards

The significant hazards discussion is contained in the cover letter.

7. Environmental Consequences

The waiver of compliance and license amendment do not involve irreversible environmental consequences. There are no new or different physical interactions involved with not testing the source range channels during power operations.