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 CUTTER,A.B. Carolina Power & Light Co.
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SUBJECT: Requests waiver of compliance from TS 3.5.3.3,Table 3.5-7,
 Items 3.a & 3.b Required Action B.

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Carolina Power & Light Company

SERIAL: NLS-90-194

SEP 21 1990

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 WAIVER OF COMPLIANCE

Gentlemen:

Carolina Power & Light Company (CP&L) hereby requests a waiver of compliance with regard to the following Technical Specification:

Technical Specification 3.5.3.3, Table 3.5-7, Items 3.a and 3.b,
Required Action b.

This specification for the Radioactive Gaseous Effluent Monitoring Instrumentation for the Containment Vessel via the Plant Vent pathway requires that should either RMS-11, Radioparticulate Monitor, or RMS-12, Radionoble Gas Monitor, be out of service and both their backup monitors, RMS-14 and RMS-34, Plant Vent Radionoble Gas Monitors, also be out of service, all releases via this pathway be suspended.

Carolina Power & Light Company requests that when RMS-11, RMS-12, RMS-14, and RMS-34 are out of service while upgrading the Radiation Monitoring System (RMS) and containment vessel integrity is not required, effluent releases via this pathway may continue with a compensatory action that grab samples of the containment vessel atmosphere are taken once per 12 hours and analyzed for radionoble gases within 24 hours.

This waiver request differs from those described in NRC guidance in that the relief is not needed to allow processing of an emergency or exigent Technical Specification change; rather the relief is needed to allow implementation of a radiation monitoring system upgrade for which a Technical Specification is already being processed at NRC on a previously agreed upon schedule.

The compensatory action of twice daily grab sample monitoring has been proposed as one element of that Technical Specification change associated with this RMS upgrade and is consistent with the backup monitoring permitted for other Radiation Monitoring instrumentation included in Table 3.5-7.

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411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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DISCUSSION

CP&L is significantly upgrading the radiation monitoring system at HBR2. This is being accomplished by means of two plant modifications during the refueling outage. During scheduling of refueling outage 13 work, it was discovered that in order to implement the RMS upgrade, RMS-11 and 12 and their backup monitors (RMS-14 and RMS-34) would need to be removed from service for a duration expected to be five weeks. Without a Technical Specification waiver of compliance, all releases from containment would have to be halted.

As discussed in the August 21, 1990 proposed Technical Specification change, containment purges are desired during refueling outages for continued assurance of appropriate effluent accountability and appropriate environmental conditions for plant workers. The intent of the proposed change to allow grab sampling will provide a sampling method as a contingency should the new, single backup radiation monitor R14C be out of service at the same time as RMS-11 or RMS-12 were out of service. This feature, however, would only be allowed when containment integrity was not required, i.e., when the potential for radioactive releases is minimal. The compensatory action proposed for the duration of this waiver would be the implementation of the same backup grab sampling which has already been proposed as part of the changes associated with the upgrade.

It should be noted that for the Technical Specification-required portions of the Radiation Monitoring Systems, compensatory measures (such as grab sampling, e.g. Table 3.5-7 items 5, 6a, et al) allowing continued releases for several other monitors removed from service are already provided; however, not for RMS-11 and RMS-12. Also, the release path, which is monitored for effluent accountability, passes through a HEPA and carbon filter that will minimize the significance of a particulate or iodine release. This pathway is sufficient to assure adequate environmental conditions for workers.

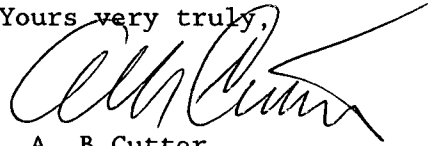
The proposed waiver does not involve a significant hazard consideration since there are no changes which (1) create new or different accident scenarios, or (2) impact the probability or consequences of accidents previously analyzed. There is no significant decrease in a margin of safety since effluent releases continue to be through the normal filtered pathway, the releases will continue to be verified within acceptance limits, and the compensatory action provides adequate effluent accountability while the waived devices are removed from service. The compensatory action is consistent with the backup monitoring permitted by Technical Specifications for other radiological monitoring system instrumentation. Additionally, the planning for this outage requires the reactor core to be off loaded to the spent fuel pool. This off load will have been accomplished by the time the waiver will be used and will further reduce the already minimal potential for radioactive releases.

In order that the fuel loading schedule not be delayed, CP&L requests NRC grant approval of this waiver by October 3, 1990.

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Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,



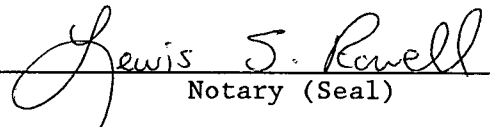
A. B. Cutter
Vice President

Director - Special Nuclear Projects

JSK/ecc (821RNP)

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo

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.


Notary (Seal)

My commission expires: 7/12/94

