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 AUTH.NAME AUTHOR AFFILIATION
 VAUGHN,G.E. Carolina Power & Light Co.
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SUBJECT: Requests for exigent handling of license amend.

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Carolina Power & Light Company

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SEP 28 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 EXIGENT HANDLING OF LICENSE AMENDMENT

Gentlemen:

Carolina Power & Light Company (CP&L) submitted a license amendment request dated August 21, 1990 in support of an upgrade of the Radiation Monitoring System (RMS) currently being implemented at H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). During scheduling of outage work, it was realized that implementation of the upgrade would require containment vessel via plant vent monitors RMS-11 and RMS-12 and their back-up monitors, RMS-14 and RMS-34, to be out of service. Under these circumstances, current Technical Specifications (TS) would require suspension of releases through the plant vent (purging).

The August 21, 1990 license amendment request contains a provision which would allow continuation of purging during periods when the subject monitors are out of service and containment integrity is not required, provided that a grab sample of the containment atmosphere is taken at least every 12 hours and analyzed within 24 hours. A waiver request to allow grab sampling under existing Technical Specifications during this modification was submitted on September 21, 1990.

As a result of subsequent discussions with the NRC Staff, CP&L hereby requests exigent handling of our August 21, 1990 Technical Specification change request in accordance with the provisions of 10 CFR 50.91(a)(6) in order to allow continued purging of the containment vessel during RMS modification. The amendment need date is October 3, 1990. A temporary waiver of compliance in accordance with NRR's memorandum guidance of February 22, 1990 is also requested to grant TS relief in the intervening time period while the exigent amendment is being processed.

Exigent handling in accordance with 10 CFR 50.91 is necessary in order to avoid an unnecessary outage extension which would result in lost generation and an increase in overall personnel radiation exposure. The outage extension would result from our inability to proceed with the simultaneous removal from service of plant monitors RMS-11, 12, 14, and 34 in support of the RMS upgrade project. This potential delay cannot be avoided since alternate approaches would require a major revision to the modification, requiring that the monitors be taken out of service sequentially so that all four would not be inoperable at the same time. This would result in a significant increase in both complexity and elapsed time since work would be occurring around live monitors in sequence versus simultaneous work on a completely de-energized system. The overall impact could be an extension of up to two weeks in the outage duration.

Our letter of September 21, 1990 contains a detailed discussion in support of the temporary waiver of compliance. The modification which is driving the need for this waiver and exigency is a proactive system upgrade which was scheduled during the latter stages of refueling outage preparation. As

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discussed in the above referenced letter, the compensatory action is grab sample monitoring as requested in the TS change request of August 21, 1990. A detailed safety evaluation and determination of no significant hazards were also previously provided in support of the amendment request. The proposed grab sample monitoring would only be allowed during periods when containment integrity is not required. Thus, there are no irreversible environmental consequences of filtered purging during this time frame. Additionally, in this particular waiver request period, the entire core will have been off loaded to the spent fuel pool.

Finally, pursuant to a September 26, 1990 telecon with the NRC, several specific questions were asked concerning the RMS upgrade modification and amendment request. The answers to these questions will be submitted under separate cover.

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

Yours very truly,

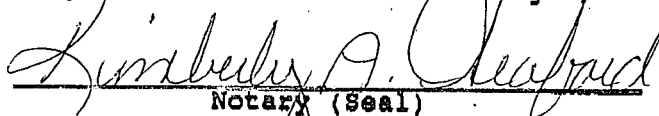


G. E. Vaughn
Vice President
Nuclear Services Department

RWP/esc (831RNP)

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

G. E. Vaughn, 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:

12-17-92