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SUBJECT: Application for amend to license DPR-23,revising Tech Specs 3.3.1.2 & 3.3.1.3 to allow one safety injection accumulator to be inoperable for improper pressure,borated water vol or boron concentration for same LCO.

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT - SAFETY INJECTION ACCUMULATOR ACTION STATEMENT

Gentlemen:

The purpose of this letter is to request a revision to the Technical Specifications (TSs) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101.

A literal reading of TSs 3.3.1.2 and 3.3.1.3 does not provide an Action Statement to address situations where a safety injection accumulator is declared inoperable due to volume, pressure, or boron concentration. This has resulted in confusion on the part of Operations personnel with regard to the proper application of this TS, and has resulted in entry into TS 3.0 (eight-hour shutdown requirement) and the subsequent required submittal of a Licensee Event Report (LER).

A commitment was made within LER 91-005, dated May 13, 1991, to review this TS and to determine wording enhancements which can be made to ensure proper and consistent application, and to submit proposed TS changes by November 29, 1991. This amendment request satisfies this commitment.

TSs 3.3.1.2 and 3.3.1.3 are revised such that one safety injection accumulator may be inoperable for improper pressure, borated water volume, or boron concentration for the same LCO time currently allowed by the TS for inoperability due to being isolated.

Enclosure 1 is a Supporting Analyses/Safety Analyses.

Enclosure 2 is a Significant Hazards Determination.

Enclosure 3 provides marked-up and retyped TS pages.

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If you have any questions concerning this request, please contact Mr. R. W. Prunty at (919) 546-7318.

Very truly yours,

C. R. Dietz
Vice President
Robinson Nuclear Project Department

JSK:dwm

Enclosures

cc: Mr. S. D. Ebneter
Mr. L. W. Garner
Mr. R. Lo
Mr. H. G. Shealy (SC)
Attorney General (SC)

C. R. Dietz, 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.

Deborah W. Martin
Notary (Seal)

My commission expires: 6/23/98

bcc: Mr. H. R. Banks
Mr. R. S. Beverage (RNP)
Mr. R. G. Black, Jr.
Mr. R. K. Buckles (LIS)
Mr. R. H. Chambers (RNP)
Mr. R. M. Coats
Mr. C. R. Dietz (RNP)
Mr. J. A. Dobbs (RNP)
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Mr. M. D. Hill
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Mr. R. M. Parsons
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Mr. D. C. Stadler (RNP)
Mr. R. S. Stancil
Mr. R. B. Van Metre
Mr. R. A. Watson
Siemens Nuc. Pwr. Corp. (T. Dresser)
File: RC/A-2
File: R-2-0511

ENCLOSURE 1

Supporting Analyses/Safety Analyses

The proposed changes correct an existing deficiency within Technical Specifications (TSs) 3.3.1.2 and 3.3.1.3 in that there is currently no Action Statement to address an accumulator that becomes inoperable due to volume, pressure, or boron concentration. A literal reading of the existing TSs requires entry into TS 3.0 whenever an accumulator becomes inoperable for any other reason than the discharge isolation valve being closed. The existing wording is subject to misinterpretation, could result in entry into an improper Action Statement, and should be corrected.

The proposed wording of TS 3.3.1.2 would clarify this specification by allowing one accumulator to be inoperable due to volume, pressure, or boron concentration for a period not to exceed four hours. This is consistent with the existing Action Statement which allows one accumulator to be isolated for a period not to exceed four hours. As such, the allowed out-of-service time for an inoperable accumulator will be consistent with that allowed for an isolated accumulator, which in turn will ensure that the existing margin of safety is maintained. It is further noted that the proposed change to TS 3.3.1.2 may result in some minor differences between the currently allowed LCO time and the LCO time proposed in the revised specification. The existing specification would require by TS 3.0 that the unit be placed in hot shutdown within eight hours of the declaration of inoperability. However, the proposed specification would allow one accumulator to be inoperable for up to four hours, after which the reactor would be placed in hot shutdown utilizing normal operating procedures. It is conceivable, but considered unlikely, that a normal plant shutdown would require more than an additional four hours. In total, any minor differences between existing and proposed LCO times are considered to be insignificant from a safety standpoint. The question of LCO times for achieving cold shutdown is immaterial since TS 3.3.1.3 allows the accumulators to be isolated when the unit is in hot shutdown. For consistency, the proposed change to TS 3.3.1.2 will necessitate a change to TS 3.3.1.3.

In summary, the proposed changes will clarify the wording of these TSs by providing a specific Action Statement to address an accumulator that is not isolated, but is otherwise inoperable. The proposed four-hour LCO time is consistent with the existing LCO time provided for an isolated accumulator. Any differences between the existing and proposed times to achieve hot shutdown are expected to be minor and are considered to have an inconsequential impact on safety. Therefore, the proposed changes are considered to be appropriate and conservative, and do not reduce the margin of safety provided within the TSs.

ENCLOSURE 2

Significant Hazards Determination

Carolina Power & Light Company (CP&L) has reviewed the subject Technical Specification (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 the proposed change, including the four-hour LCO time requirement, is consistent with requirements provided within the existing TSs. The proposed change only clarifies the existing TS by providing an Action Statement to address an inoperable accumulator. In addition, the accumulators are an accident mitigating system that is not part of any previously evaluated accident initiating sequences; therefore, the probability of a previously analyzed accident is not significantly increased.

   The safety significance associated with an inoperable accumulator is considered to be no different than that associated with an isolated accumulator. Additional time would be provided to allow the accumulator safety parameters to be returned to within specifications without taking the plant through the perturbation of a power reduction.

   Although there are physical differences between an isolated accumulator and an inoperable accumulator, the implementation of a four hour LCO due to an inoperable accumulator does not affect the margin of safety, nor does it increase the consequences of an accident previously evaluated. Our past and present LOCA calculation methods, performed in accordance with 10CFR50 Appendix K, are not able to show acceptable results with an inoperable accumulator. The inherent presumption is that the four hour time period is short enough that we are allowed to consider the accumulators as always being operable. More specifically, a qualitative assessment shows that the probability of a LOCA occurring during the four hour LCO is low enough to be inconsequential. Therefore, implementation of a four hour LCO due to an inoperable accumulator is consistent with the margin of safety incorporated into the existing Technical Specifications.

   It can be postulated that the proposed LCO time to hot shutdown may exceed the time requirement of the existing specification. However, any difference between the current and proposed time to hot shutdown is expected to be minor and is considered to have an inconsequential impact on plant safety.

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 because the proposed change provides a specific Action Statement to address a probable plant condition. Additionally, no modifications are being made to plant equipment or procedures; therefore, no new or different accident scenarios can be introduced.

3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety.

Implementation of the proposed amendment will allow an accumulator to be inoperable for four hours prior to placing the reactor in hot shutdown with normal operating procedures. The time until achieving hot shutdown will not be significantly different than the current situation, which requires hot shutdown within eight hours. Based on a qualitative assessment of LOCA calculation methods, the implementation of a four hour LCO due to an inoperable accumulator will maintain the margin of safety already provided by the LCO for an isolated accumulator. Therefore, operation of the facility in accordance with the proposed amendment will not involve a reduction in a margin of safety.