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SUBJECT: Requests exigency handling for license amend request  
 submitted on 920305 for plant.

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ATTENTION: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR EXIGENCY HANDLING OF LICENSE AMENDMENT REQUEST

Gentlemen:

The purpose of this letter is to request exigency handling for a license amendment request submitted on March 5, 1992 for the H. B. Robinson Steam Electric Plant, Unit No. 2. The amendment, which will allow the suspension of required actions during the inoperability of certain fire protection equipment inside the containment, is needed by April 7, 1992 to support the conduct of an Integrated Leak Rate Test (ILRT) and Structural Integrity Test (SIT) during Refueling Outage 14.

Carolina Power & Light Company (CP&L) has exerted its best effort to make a timely application for the proposed amendment. Initial concerns regarding the ability to satisfy the required action statement of the subject Fire Protection Technical Specification (TS) were expressed by Operations personnel February 4, 1992 during a review of the ILRT procedure EST-085, "Containment Integrated Leak Rate Test." In response to these concerns, an investigation was initiated which involved a review of the test procedure, the applicable TS, testing practices used at other sites, and the approach used during a 1987 performance of this test.

Review of the test procedure and associated ILRT requirements confirmed the need to disable the containment fire hose stations and electrical penetration pre-action suppression system. The fire water valves supplying these systems are outside of the containment and function as containment isolation valves. These valves are not supplied by the plant's isolation valve seal water system. As such, leak tightness must be checked to satisfy the requirements of 10CFR50, Appendix J. Also, these piping systems are provided with "supervisory air" which is at a pressure greater than the ILRT test pressure. Therefore, leaving these systems in service would create the possibility of supervisory air leaking into the containment, masking possible containment outleakage, and jeopardizing the validity of the test. The option of performing a local leak rate test was considered; however, the associated penalties which would have to be applied to the overall containment leakage value were considered prohibitive.

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With the above stated as a basis, investigation of the initial Operations concern was completed on February 21, 1992, which resulted in the determination that a TS amendment was required to support proper performance of the ILRT while satisfying the requirements of the Fire Protection TS and Program. Subsequent to this determination, an amendment request was prepared and presented to the Plant Nuclear Safety Committee on February 27, 1992, with the formal submittal to NRC being finalized on March 5, 1992. In summary, upon confirmation of the conflict between the ILRT testing requirements and the compensatory actions required by the Fire Protection TS, CP&L undertook prompt action to fully investigate this issue and prepare the necessary documentation to support the submittal of the amendment request. Initially, CP&L believed that the rather straightforward license amendment request could be processed by routine, but expedited, handling by the NRC. However, it has become apparent that the short time until the amendment is needed does not allow adequate time for processing even on an expedited basis.

Without exigent handling, it is projected that the performance of the ILRT and SIT will be delayed approximately one week, which would likewise delay the start of critical containment work and likely extend the outage completion date.

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

Yours very truly,



Charles R. Dietz  
Vice President  
Robinson Nuclear Project

JSK/jbw

cc: Mr. S. D. Ebner  
Mr. L. W. Garner  
Mr. R. Lo  
Mr. Heyward 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