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FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
AUTH.NAME AUTHOR AFFILIATION  
STARKEY,R.B. Carolina Power & Light Co.  
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: Forwards application for amend to license DPR-23,consisting  
of TS change request 44, revising TS 4.1-1 to include  
footnoted info associated w/refueling interval calibration.  
W/920605 ltr.

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SERIAL: NLS-92-162  
10CFR50.90

R. B. STARKEY, JR.  
Vice President  
Nuclear Services Department

JUN 05 1992

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENDMENT  
CALIBRATION OF CONTAINMENT HIGH-RANGE RADIATION MONITOR

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 (HBR2).

This Amendment will clarify Item 44 of Technical Specification (TS) Table 4.1-1, which specifies the minimum frequencies for checks, calibrations and tests of the Containment Vessel (CV) High-Range Radiation Monitors (R-32A and B). More specifically, the footnoted information associated with the refueling interval calibration, "Calibration performed in accordance with CP&L's letter dated April 28, 1982; S. R. Zimmerman to S. A. Varga," may be literally interpreted to only allow calibration of the CV High-Range Monitors using the methodology provided within this correspondence. As such, there is currently no latitude to allow calibration using the Special Calibration methodology provided within NUREG-0737, Item II.F.1, Attachment 3, and associated Table II.F.1-3, the original guidance document.

The purpose of the proposed Amendment is to revise the footnote such that the calibration method provided within the 1982 correspondence is clearly identified as an equally acceptable alternative to the NRC-preferred calibration technique described within NUREG-0737. The presence of this footnote should not preclude calibration of the CV High-Range Radiation Monitors using the NUREG-0737 methodology.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details, in accordance with 10CFR50.91(a), the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

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Enclosure 3 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the proposed Technical Specification page.

In accordance with 10CFR50.91(b), CP&L is providing the State of South Carolina with a copy of the proposed license amendment.

Please refer any questions regarding this submittal to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,



R. B. Starkey, Jr.

JSK/jbw

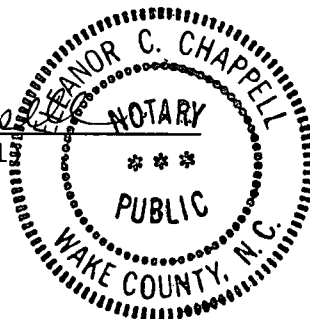
Enclosures:

1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Technical Specification Page

cc: Mr. S. D. Ebnetter  
Mr. L. W. Garner  
Ms. B. L. Mozafari  
Mr. Heyward G. Shealy (SC)  
Attorney General (SC)

R. B. Starkey, Jr., 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.

Eleanor C. Chappell  
Notary (Seal)



My commission expires: 2/6/96

ENCLOSURE 1

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

BASIS FOR CHANGE REQUEST

Background

This Amendment will clarify Item 44 of Technical Specification (TS) Table 4.1-1, which specifies the minimum frequencies for checks, calibrations and tests of the Containment Vessel (CV) High-Range Radiation Monitors (R-32A and B). More specifically, the footnoted information associated with the refueling interval calibration, "Calibration performed in accordance with CP&L's letter dated April 28, 1982; S. R. Zimmerman to S. A. Varga," may be literally interpreted to only allow calibration of the CV High-Range Monitors using the methodology provided within this correspondence. As such, there is currently no latitude to allow calibration using the Special Calibration methodology provided within NUREG-0737, Item II.F.1, Attachment 3, and associated Table II.F.1-3, the original guidance document.

Proposed Change

The proposed Amendment will revise the wording of the footnote associated with the refueling interval calibration of the CV High-Range Radiation Monitors. The revised footnote wording is shown on the attached mark-up of TS page 4.1-9a, and is as follows:

"CP&L's letter dated April 28, 1982, S. R. Zimmerman to S. A. Varga, provides an acceptable alternate calibration methodology."

This revised wording will more clearly reflect the acceptability of the approved, alternate calibration methodology, while providing the flexibility to calibrate these monitors utilizing the preferred methodology described within NUREG-0737.

Basis

NUREG-0737, Item II.F.1, Attachment 3, provides requirements for the "Containment High-Range Radiation Monitor," including Special Calibration requirements provided within associated Table II.F.1-3. These requirements represent the NRC-approved methodology for design, installation, and testing/calibration of accident range area radiation monitoring for the containment.

Within a letter from Mr. E. E. Utley to Mr. D. G. Eisenhut, dated June 30, 1981, "NUREG-0737: July 1, 1981 Items," CP&L provided the required documentation and commitments for completion of NUREG-0737 items which were applicable to H. B. Robinson, Unit 2 (HBR2). This submittal identified one deviation from the NUREG requirements for the Containment High-Range Radiation Monitors in that the required "calibrated radiation source calibration" of the decade below 10 R/hr would be performed in the plant's test lab, rather than in the installed location.

Within an NRC letter from Mr. D. B. Vassallo to Mr. J. A. Jones, dated February 26, 1982, "NUREG-0737 Action Item II.F.1.3, Containment High-Range Monitor," the NRC required that CP&L support the proposed deviation by demonstrating that the alternative calibration method would ensure that the entire channel, including the sensor (ion chamber), is accurately functioning after reinstallation, and that an in-situ source calibration at one point of the low range of the monitors is not required.

CP&L provided a letter from Mr. S. R. Zimmerman to Mr. S. A. Varga, dated April 28, 1982, "NUREG-0737, Action Item II.F.1.3 Containment High-Range Monitor," which described the alternative calibration methodology that would be used. It was stated within this letter that the proposed alternative calibration methodology, combined with the non-in-situ and in-situ Electronic Check Source circuit checks, would demonstrate that the entire channel is functioning accurately, and would fulfill the intent of the in-situ source check requirement provided within NUREG-0737.

On November 1, 1983, the NRC issued Generic Letter No. 83-37, "NUREG-0737 Technical Specifications," which provided guidance on the scope of TS changes that the NRC would find acceptable with regard to NUREG-0737 instrumentation. This Generic Letter provided guidance and model TS for the Containment High-Range Radiation Monitors, and noted that "acceptable calibration techniques for these monitors are discussed in NUREG-0737."

A number of subsequent submittals followed from CP&L that requested revisions to the HBR2 TS in response to Generic Letter No. 83-37. The first of these, dated February 7, 1984, included proposed TS for the CV High-Range Radiation Monitor (Item 44 of Table 4.1-1), which further included the footnoted reference to CP&L's alternative calibration methodology provided within the April 28, 1982 letter from Mr. Zimmerman to Mr. Varga. The NRC approved the CV High-Range Radiation Monitor TS, as originally proposed and including the footnoted reference to the alternative calibration methodology, with the issuance of Amendment No. 94 on August 29, 1985.

During the recent review of a proposed revision to procedure RST-020, "Verification of Electronic Calibration of Radiation Monitoring System Monitors R-32 A&B", the specific meaning and application of this footnote was questioned. This ultimately resulted in a thorough review of the licensing background and history associated with the development and implementation of this TS, which is reflected in the information provided above. The results of this review were presented to the Plant Nuclear Safety Committee (PNSC) on May 20, 1992, at which time it was concluded that the CV High-Range Radiation Monitor calibration must be performed using the methodology provided within the 1982 correspondence to ensure strict compliance with the current Technical Specification.

Further, it has been recognized that the preferred calibration methodology is that provided within NUREG-0737. Performance of this calibration in-situ provides a more accurate and reliable calibration. In addition, the removal of the monitors for a non-in-situ calibration results in the disassembly and reinstallation of environmentally qualified seals and connectors. This process has been found to be costly and time-consuming. Therefore, the TS should be amended to facilitate calibration using the NUREG-0737 methodology, while providing an option to perform a non-in-situ calibration in accordance with the 1982 correspondence.

The proposed change to Table 4.1-1 is considered to be insignificant from a nuclear safety perspective. Either calibration method will ensure the operability and availability of the Containment High-Range Radiation Monitors, and the TS should allow the use of either calibration method. In addition, this TS change will reduce or eliminate the possibility of future misinterpretation, thereby helping to ensure compliance with the TS.

#### Conclusions

This revised wording will more clearly reflect the acceptability of the approved, alternate calibration methodology, while providing the flexibility to calibrate these monitors utilizing the preferred methodology described within NUREG-0737. The proposed change will maintain the current level of safety provided by the High-Range Radiation Monitors.

ENCLOSURE 2

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

10CFR50.92 EVALUATION

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards determination. The bases for this determination are as follows:

Proposed Change

The proposed amendment will revise the wording of the footnote associated with the refueling interval calibration of the Containment Vessel (CV) High-Range Monitors. The revised footnote wording is shown on the attached mark-up of TS page 4.1-9a, and is as follows:

"CP&L's letter dated April 28, 1982, S. R. Zimmerman to S. A. Varga, provides an acceptable alternate calibration methodology."

This revised wording will more clearly reflect the acceptability of the approved, alternate calibration methodology, while providing the flexibility to calibrate these monitors utilizing the methodology described within NUREG-0737.

Basis

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed amendment only involves the methodology used for calibration of the CV High-Range Radiation Monitors and, therefore, has no effect on the probability of any previously evaluated accidents. The calibration method provided by the 1982 correspondence has been previously evaluated as an acceptable deviation from the NUREG-0737 calibration method. The proposed amendment would clearly identify this method as an alternative to the NUREG-0737 method, and would facilitate calibration using the preferred, NRC-approved methodology. The intent of this calibration requirement is to ensure the availability of properly functioning accident radiation monitors during the unlikely event of an accident involving a significant release of radioactivity to the containment atmosphere. Since either calibration

method is acceptable for ensuring the operability of these monitors, the proposed amendment does not increase the consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed amendment only involves a change to the CV High-Range Radiation Monitor calibration method. This calibration will continue to be performed on a refueling interval basis, and typically the unit is in cold shutdown during this calibration. The proposed amendment will not physically change any equipment or mode of operation, and will provide the calibration using either of two NRC-approved methods. The proposed change merely identifies an alternative to the NUREG-0737 method, and would facilitate calibration using either of two, NRC-approved methods, and therefore the proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety because the proposed amendment only involves a change to the CV High-Range Radiation Monitor calibration method. This calibration will continue to be performed on a refueling interval basis, and typically the unit is in cold shutdown during this calibration. The proposed amendment will not physically change any equipment or mode of operation, and will provide the calibration using either of two NRC-approved methods. The proposed change only facilitates an alternative to the preferred calibration method; either method is acceptable for ensuring the operability of these monitors and the availability of post-accident radiation monitoring for the Containment.



ENCLOSURE 3

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

ENVIRONMENTAL CONSIDERATIONS

10CFR51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluent that may be released off-site; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

The proposed Amendment will revise the wording of the footnote associated with the refueling interval calibration of the CV High-Range Monitors. The revised footnote wording is shown on the attached mark-up of TS page 4.1-9a, and is as follows:

"CP&L's letter dated April 28, 1982, S. R. Zimmerman to S. A. Varga, provides an acceptable alternate calibration methodology."

This revised wording will more clearly reflect the acceptability of the approved, alternate calibration methodology, while providing the flexibility to calibrate these monitors utilizing the preferred methodology described within NUREG-0737.

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.

2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluent that may be released off-site. The proposed change only allows an alternative to the preferred calibration method, and cannot create the possibility of a significant change in the types or significant increase in the amounts of any effluent that may be released off-site.
3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change only allows the use of either of two NRC-approved methods for calibrating the Containment High-Range Monitor. There should be essentially no difference in radiation exposure regardless of which calibration method is used.

ENCLOSURE 4

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

PAGE CHANGE INSTRUCTIONS

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| 4.1-9a              | 4.1-9a               |

ENCLOSURE 5

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

TECHNICAL SPECIFICATION PAGE