

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Responds to NRC 811221 request for addl info re purging & venting of containment. Purging time will be based on safety-related requirements. NRC should provide specific basis re necessity of using of debris screens.

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 TITLE: Containment Purging

NOTES:

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	NRR SHUM, D 15	1	NRR/DE/eqb 09	1
	NRR/DL/ORAB 10	1	NRR/DSI ADRS	1
	NRR/DSI/AEB	1	NRR/DSI/CSB 12	1
	NRR/DSI/ETSB 08	1	NRR/DSI/RAB 11	1
	REG FILE 04	1		
EXTERNAL:	ACRS 13	10	LPDR 03	1
	NRC IPDR 02	1	NSIC 05	1
	NTIS	1		



Carolina Power & Light Company

January 29, 1982

Office of Nuclear Reactor Regulation
ATTN: Mr. Steven A. Varga, Chief
Operating Branch No. 1
U. S. Nuclear Regulatory Commission
Washington, DC 20555



H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REQUEST FOR ADDITIONAL INFORMATION -
PURGING AND VENTING OF CONTAINMENT

Dear Mr. Varga:

This letter is in response to your letter of December 21, 1981, concerning closing out the containment vent and purge issue at H. B. Robinson (HBR). Each of the outstanding long range status items you have identified are addressed below.

NRC COMMENT

1. Conformance to Standard Review Plan Section 6.2.4 Revision 1 and Branch Technical Position CSB 6-4 Revision 1

In your response of January 19, 1979, to our letter of November 28, 1978, you stated that you planned to justify unlimited purging during operation of the Robinson Plant. We have reviewed the information you have provided in support of your position, but we believe your plant would be inherently safer if the purge/vent valves were opened only for safety-related reasons. The bases for our position are given in the enclosed Safety Evaluation (Enclosure 2) for use of purge/vent valves and in the restatement of the salient features of Branch Technical Position CBS 6-4 Revision 1 (Enclosure 3).

On the basis of this Safety Evaluation and subject to your satisfying the valve operability criteria (see item 2), purging will be permitted providing you take the following actions:

- (1) Commit to a goal representing a limit to the use of the purge/vent to a specified annual time that would be system commensurate with identified safety needs.
- (2) Provide debris screens for the purge/vent systems as noted in the Safety Evaluation.

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Response 1

It is our belief, after reading the referenced SER, that the reviewers did not understand Carolina Power & Light Company's (CP&L) position with respect to containment venting and purging. CP&L is in complete agreement with the NRC philosophy of using the purge/vent valves for only safety-related reasons during plant operation. CP&L is committed to using the purge/vent valves for only safety-related reasons (nuclear-safety, personnel-safety, ALARA, etc.). Since the HBR purge and vent valves are qualified, CP&L does not believe that an arbitrary time limit on purging is necessary or justified. Nor is there a reasonable method to accurately determine what this limit might be. Purging time at HBR therefore will be based on safety-related requirements (operational experience has shown this time, under normal operation, to be significantly less than 90 hours per year).

CP&L is investigating the need for debris screens, however, the description of the purge and vent valve system in the SER seems to indicate sufficient protection to insure that valve failure due to debris will not occur. To aid in our review of this issue, we request that you provide the specific basis behind the reviewer's belief that debris screens are necessary at HBR. We will inform you of our final determination regarding debris screens when our investigation is complete. In the interim, we believe that there is sufficient justification in the SER for continued venting, as described above, pending resolution of this item.

NRC COMMENT2. Operability - 42-inch Supply-Exhaust and 6-inch Pressure-Vacuum Valves

This item is still under review. In order to complete this action, we need additional information to confirm that the valve assemblies are seismically qualified.

- (1) Confirm that purge/vent valve assemblies are qualified against seismic loads.
- (2) Discuss testing and maintenance program for valves and resilient seats.
- (3) Discuss the capability of one valve to close properly if the other series valve (6-inch or 42-inch) fails partially open.

Response 2.(1)

The HBR 6" and 42" purge and vent valves are seismic Class I valves. They were specified (Ebasco Specification CPL-R2-MV-15, Revision 0, January 29, 1969) and designed to a seismic loading of .24 g in any direction. The HBR design basis for seismic loads are .133 g vertical and .2 g horizontal.

Response 2.(2)

The maintenance instructions for the containment purge and venting valves have been reviewed by maintenance personnel and the manufacturer's recommendations are being followed. Inline lubricators in the air supplies to these valves have recently been installed and plans are to inspect the elastomeric components in the valves to determine their condition and possible replacement during the 1982 refueling outage.

Response 2.(3)

The controls for both the 42" and 6" purge and vent valves are mechanically and electrically separated. CP&L has discussed the possibility of any other type of correlation between two series valves with the valve manufacture and knows of no effect which would invalidate the tests and analysis performed to date. Therefore, we have determined that one valve will close as designed independent of the state of the other series valve.

NRC COMMENT

3. Safety Actuation Signal Override

This item is still under review. We held several recent discussions between members of the NRC and CP&L staffs. We are now awaiting further information from your staff to supplement the information submitted in your letter of October 7, 1981.

Response 3

Information regarding Safety Actuation Signal Override is being forwarded in a separate letter as requested by your staff.

NRC COMMENT

4. Containment Leakage Due to Seal Deterioration

We request that you propose a Technical Specification change that incorporates an acceptable valve surveillance program. Also, you should provide the details of your proposed test program for our information.

Response 4

CP&L does not believe a Technical Specification change covering containment leakage due to seal deterioration is needed at HBR. The leakage rate of the purge and vent valves is constantly monitored

Mr. Varga

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by the Penetration Pressurization System (PPS) during power operation and would alarm in the control room in the event of valve leakage (.5 scfm). The PPS system insures that the integrity of the purge and vent valves will be maintained.

CP&L has reviewed our Technical Specification submittal of June 20, 1981, concerning specifications 3.6.4 and 4.4.5. This submittal is correct and should stand as submitted.

If you have any further questions, please feel free to contact my staff.

Yours very truly,



S. R. Zimmerman

Manager

Licensing & Permits

DCW/dk (121-896)

cc: Messrs. J. P. O'Reilly
W. J. Ross