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(TEMPORARY FORM)

CONTROL NO: **9904**  
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FROM: Carolina Power & Light Co Raleigh, N. C. E.E. Utley			DATE OF DOC 9-16-75	DATE REC'D 9-17-75	LTR XXX	TWX	RPT	OTHER
TO: Karl R. Goller			ORIG 3 Signed	CC 37	OTHER	SENT NRC PDR XXX SENT LOCAL PDR XXXX		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 40		DOCKET NO: 50-261		

DESCRIPTION:  
Ltr. notarized 9-16-75...Ltr reoour ltr. dtd 8-7-75  
8-7-75...Furnishing info regarding Study concerning Leakage rate testing.....

( 40 cys. Rec'd)

ENCLOSURES:

**DO NOT REMOVE  
ACKNOWLEDGED**

PLANT NAME: H.B. Robinson # 2

**FOR ACTION/INFORMATION**

VCR 9-24-75

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Carolina Power & Light Company

September 16, 1975

Regulatory Docket File

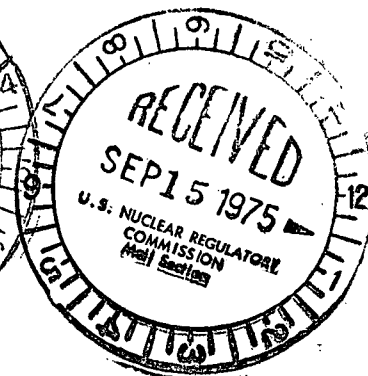
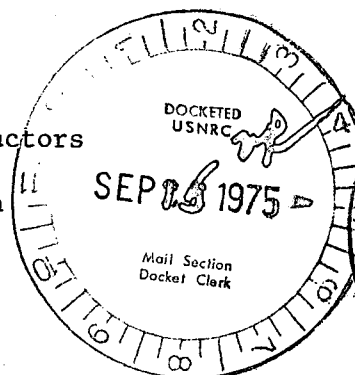
File: NG-3514 (R)

Serial: NG-75-1464

Mr. Karl R. Goller  
Assistant Director for Operating Reactors  
Division of Reactor Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

50-261

Dear Mr. Goller:



H. B. ROBINSON UNIT NO. 2  
LICENSE NO. DPR-23  
COMPLIANCE WITH 10CFR50 APPENDIX J

Your letter of August 7, 1975 requested that a study be performed to determine whether H. B. Robinson Unit No. 2 is performing leak rate testing in conformance with 10CFR50 Appendix J. The requested study has been performed and three areas have been found which, while in compliance with Technical Specifications, do not comply with Appendix J.

Appendix J specifies the maximum acceptable Type A test leakage  $L_t$  to be  $L_t = L_a (L_{tm}/L_{am})$  unless  $(L_{tm}/L_{am})$  is greater than 0.70, in which case  $L_t = L_a (P_t/P_a)^{1/2}$ . Technical Specification 4.4.1.1.f.2 of H. B. Robinson Unit 2 utilizes the same equations, although with a different nomenclature, but specifies that the minimum of the values determined from the equations be used as the limit. The use of the lowest value of acceptable test leakage is clearly conservative. Therefore, pursuant to 10CFR50.12a an exemption is requested from the requirement to change equations for the maximum acceptable test leakage if the ratio  $(L_{tm}/L_{am})$  becomes greater than 0.70. CP&L proposes to continue to use the lower of the values calculated by the use of the two equations.

The acceptance criteria for Type A tests in sections III.A.4.b.1 and 2 of Appendix J requires that values "shall be less than 0.75. . ." while Technical Specification 4.4.1.1.f.3 requires that the allowable test leakage "shall not exceed 0.75. . . ." A Technical Specification change will be submitted to bring this item into compliance with Appendix J.

Appendix J requires the testing of air locks every six months or after each opening. Testing at this frequency of the entire air lock is both impractical and unnecessary; therefore, pursuant to 10CFR50.12a, CP&L requests an exemption from testing air locks every six months or after each opening. CP&L proposes to test the total air lock system at every refueling outage. The air lock door seals are tested at pressure  $P_a$  on a continuous basis by the plant penetration pressurization system.

9904

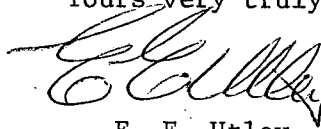
Mr. Karl R. Goller

- 2 -

September 16, 1975

As required by Commission Regulations, this submittal is signed under oath by a duly authorized officer of the Company.

Yours very truly,




E. E. Utley  
Vice-President  
Bulk Power Supply

CSB:mc

cc: Messrs. H. R. Banks  
N. B. Bessac  
E. G. Hollowell  
P. W. Howe  
J. A. Jones  
R. E. Jones  
W. B. Kincaid  
L. I. Loflin  
D. B. Waters

Duly sworn to and subscribed before me this 16th day of September

My commission expires July 4, 1980

  
Notary Public