

CONTROL NO: 1880.

FROM:		DATE OF DOC:		DATE REC'D		LTR		MEMO		RPT		OTHER	
Carolina Power & Light Company Raleigh, North Carolina E. E. Utley		3-20-73		3-21-73								TWX	
TO:		ORIG		CC		OTHER		SENT AEC PDR				X	
D. J. Skovholt		1						SENT LOCAL PDR				X	
CLASS:		U/PROP INFO		INPUT		NO CYS REC'D		DOCKET NO:					
		X		1				50-261					

TWX requesting Revision to Tech Specs...
 surveillance of charcoal and HEPA Filters....

DO NOT REMOVE

FOR ACTION/INFORMATION 3-21-73 fod

BUTLER(L)	SCHWENCER(L)	ZIEMANN(L)	YOUNGBLOOD(E)
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<u>REG FILE</u>	<u>TECH REVIEW</u>	DENTON	<u>F & M</u>	WADE	E
<u>AEC PDR</u>	HENDRIE	GRIMES	<u>SMILEY</u>	BROWN	E
<u>OGC, ROOM P-506A</u>	SCHROEDER	GAMMILL	NUSSBAUMER	G. WILLIAMS	E
<u>MUNTZING/STAFF</u>	MACCARY	KASTNER		SHEPPARD	E
CASE	KNIGHT(2)	BALLARD	<u>LIC ASST.</u>		
GIAMBUSSO	PAWLICKI	SPANGLER	<u>SERVICE</u>	L	<u>A/T IND</u>
BOYD	SHAO		WILSON	L	BRAITMAN
V. MOORE-L(BWR)	STELLO	<u>ENVIRO</u>	GOULBOURNE	L	SALTZMAN
DEYOUNG-L(PWR)	HOUSTON	<u>MULLER</u>	SMITH	L	
<u>SKOVHOLT-L</u>	NOVACK	DICKER	GEARIN	L	<u>PLANS</u>
P. COLLINS	ROSS	KNIGHTON	DIGGS	L	MCDONALD
	IPPOLITO	YOUNGBLOOD	<u>TEETS</u>	L	<u>DUBE</u>
<u>REG OPR</u>	TEDESCO	REGAN	LEE	L	
<u>FILE & REGION(2)</u>	LONG	PROJ LEADER	MAIGRET	L	<u>INFO</u>
MORRIS	LAINAS		SHAFFER	F & M	C. MILES
STEELE	BENAROYA	<u>HARLESS</u>			<u>A. Cabell</u>
	VOLLMER				

✓1-LOCAL PDR Hartville, S. C.
 ✓1-DTIE(ABERNATHY)
 ✓1-NSIC(BUCHANAN)
 1-ASLB-YORE/SAYRE
 WOODWARD/H ST.
 ✓16-CYS ACRS HOLDINGX Sent 3-21-73 to
 S. Teets for Dist.

MXUSA ED-HQS-GTWN

SP&L RAL

50-261

*Recd, 3-20-73
4:50 p.m.*

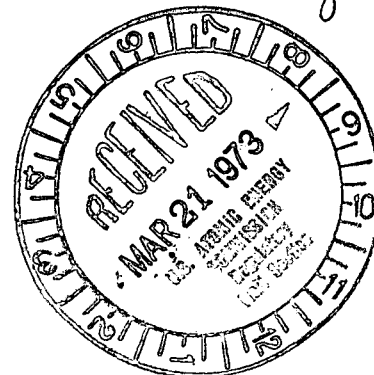
MR. D. J. SKOVHOLT

ASSISTANT DIRECTOR FOR OPERATING REACTORS

DIRECTORATE OF REACTOR LICENSING

U. S. ATOMIC ENERGY COMMISSION

WASHINGTON, D. C. 20545



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Regulatory

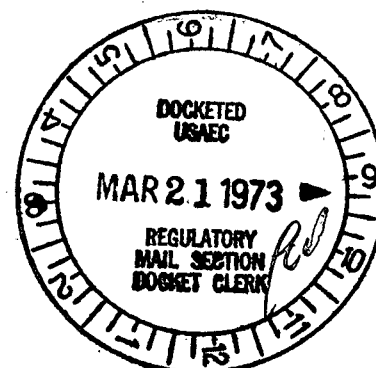
File Cv.

H. B. ROBINSON UNIT NO. 2

LICENSE DPR-23

REQUEST FOR REVISION OF TECHNICAL SPECIFICATIONS

SURVEILLANCE OF CHARCOAL AND HEPA FILTERS



DEAR MR. SKOVHOLT:

THE FOLLOWING CHANGE TO H. B. ROBINSON TECHNICAL SPECIFICATIONS
IS REQUESTED FOR THE REASON INDICATED. YOUR PROMPT CONSIDERATION
OF THIS PROPOSAL IS APPRECIATED.

TABLE 4.1-3, ITEM 16:

IN THE COLUMN ENTITLED "CHECK", IN THE SECOND SENTENCE, REPLACE
THE WORDS "...AT DESIGN FLOWS..." WITH "...AT GREATER THAN OR
EQUAL TO 20% OF DESIGN FLOWS..."

REASON:

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19
1880

DOP AND FREON ARE BASICALLY LEAK TESTS RATHER THAN EFFICIENCY TESTS, AND RATED SYSTEM AIR FLOW IS NOT NECESSARY. SINCE THESE TESTS HAVE NO RELATION TO PERFORMANCE OF THE CELLS BUT ARE INSTEAD USED TO DETECT BYPASS AND LEAKAGE FLOW PATHS, THEY ARE ACTUALLY MORE SENSITIVE AT LOW FLOWS AS STATED IN ORNL-NSIC-65, "DESIGN, CONSTRUCTION, AND TESTING OF HIGH-EFFICIENCY AIR FILTRATION SYSTEMS FOR NUCLEAR APPLICATION", BY BURCHSTEAD AND FULLER. THIS IS DUE TO THE "PINHOLE" EFFECT. PROPOSED ANSI STANDARD N45-8.3, "TESTING OF NUCLEAR AIR CLEANING SYSTEMS", HAS NO REQUIREMENT FOR TESTS AT RATED FLOW. IN ADDITION, THE EXPENSE OF DOP AND FREON GENERATING EQUIPMENT TO ATTAIN THE NECESSARY STATISTICAL CONCENTRATIONS FOR SOME LARGE CAPACITY SYSTEMS IS PROHIBITIVE IF TESTS ARE PERFORMED AT RATED FLOW. TWENTY PERCENT (20%) OF RATED FLOW IS A COMMONLY ACCEPTED GUIDELINE FOR RELIABLE TEST RESULTS.

THIS JUSTIFICATION HAS BEEN SUBSTANTIATED BY VERBAL COMMUNICATION WITH MR. C. A. BURCHSTEAD, OF OAK RIDGE NATIONAL LABORATORY, A NATIONALLY RECOGNIZED AUTHORITY ON FILTER APPLICATION AND TESTING.

VERY TRULY YOURS

E. E. UTLEY
VICE PRESIDENT
BULK POWER SUPPLY

CC: MR. C. D. BARNHAM
MR. N. B. BISSAC
MR. B. J. FURR
MR. D. V. KENSCHER

A FOLLOW-UP LETTER WILL BE FORTHCOMING.

PLEASE DELIVER AS SOON AS POSSIBLE TO MR. SKOVHOLT.

THANK YOU

END

PLEASE ACKNOLEDGE_.

ALL INFORMATION
TWX INCOMING