

AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: 3417

FILE:

FROM: Carolina Power & Light Co. Raleigh, North Carolina E. E. Utley			DATE OF DOC 4-11-74	DATE REC'D 4-18-74	LTR X	MEMO	RPT	OTHER
TO: John F. O'Leary			ORIG 3 signed	CC 37	OTHER	SENT AEC PDR <u>XXX</u> SENT LOCAL PDR <u>XXX</u>		
CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D		DOCKET NO:		
	XXX		XXX	40		50-261		

DESCRIPTION:

Ltr requesting revision to Tech Specs re definition of abnormal occurrence

ENCLOSURES:

**DO NOT REMOVE
ACKNOWLEDGED**

PLANT NAME: H. B. ROBINSON UNIT #2

FOR ACTION/INFORMATION

4-18-74

GMC

BUTLER(L)	SCHWENCER(L)	ZIEMANN(L)	REGAN(E)
W/ Copies	W/ Copies	W/ Copies	W/ Copies
CLARK(L)	STOLZ(L)	DICKER(E)	
W/ Copies	W/ Copies	W/ Copies	W/ Copies
PARR(L)	VASSALLO(L)	KNIGHTON(E)	
W/ Copies	W/ Copies	W/ Copies	W/ Copies
KNIEL(L)	✓ PURPLE (L)	YOUNGBLOOD(E)	
W/ Copies	W/9 Copies	W/ Copies	W/ Copies

INTERNAL DISTRIBUTION

✓ <u>REG FILE</u>	TECH REVIEW	DENTON	LIC ASST	A/T IND
✓ AEC PDR	HENDRIE	GRIMES		BRAITMAN
✓ OGC, ROOM P-506A	SCHROEDER	GAMMILL	DIGGS (L)	SALTZMAN
✓ MUNTZING/STAFF	MACCARY	KASTNER	GEARIN (L)	B. HURT
CASE	KNIGHT	BALLARD	GOULBOURNE (L)	<u>PLANS</u>
GIAMBUSSO	PAWLICKI	SPANGLER	LEE (L)	✓ MCDONALD
BOYD	SHAO		MAIGRET (L)	✓ DUBE w/Input
MOORE (L) (BWR)	STELLO	<u>ENVIRO</u>	REED (E)	<u>INFO</u>
DEYOUNG (L) (PWR)	HOUSTON	MULLER	SERVICE (L)	C. MILES
✓ SKOVHOLT (L)	NOVAK	DICKER	SHEPPARD (L)	B. KING (E/W-358)
✓ GOLLER (L)	ROSS	KNIGHTON	SLATER (E)	KLECKER
P. COLLINS	IPPOLITO	YOUNGBLOOD	SMITH (L)	EISENHUT
DENISE	TEDESCO	REGAN	✓ TEETS (L)	
✓ REG OPR	LONG	PROJECT LDR	WADE (E)	✓ E. COUPE Ltr
✓ FILE & REGION(3)	LAINAS		WILLIAMS (E)	
MORRIS	BENAROYA	HARLESS	WILSON (L)	
STEELE	VOLLMER			

EXTERNAL DISTRIBUTION

✓ 1 - LOCAL PDR HARTVILLE, SC	(1)(2)(10)-NATIONAL LAB'S	1-PDR-SAN/LA/NY
✓ 1 - TIC (ABERNATHY)	1-ASLBP(E/W Bldg, Rm 529)	1-GERALD LELLOUCHE
✓ 1 - NSIC(BUCHANAN)	1-W. PENNINGTON, Rm E-201 GT	BROOKHAVEN NAT. LAB
1 - ASLB	1-CONSULTANT'S	1-AGMED(Ruth Gussman)
1 - P. R. DAVIS (AEROJET NUCLEAR)	NEWMARK/BLUME/AGBABIAN	RM-B-127, GT.
✓ 16 - CYS ACRS HOLDING	1-GERALD ULRIKSON...ORNL	1-RD..MULLER..F-309 GT
Sent to Lic Asst Teets 4-18-74	1-B & M SWINEBROAD, Rm E-201 GT	<i>app. Jammes</i>



Carolina Power & Light Company

April 11, 1974

Regulatory

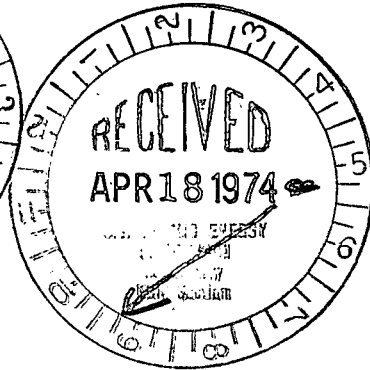
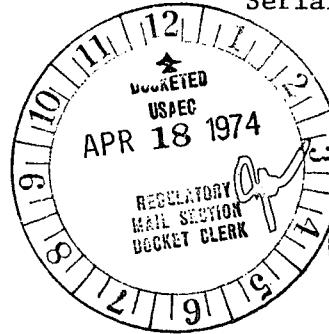
File Cy.

50 - 261

File: NG-3514

Serial: NG-74-216

Mr. John F. O'Leary, Director
Directorate of Licensing
Office of Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. O'Leary:

H. B. ROBINSON UNIT NO. 2
LICENSE DPR-23

REQUEST FOR REVISION OF TECHNICAL SPECIFICATIONS
DEFINITION OF ABNORMAL OCCURRENCES

We hereby request the following change to Technical Specifications:

Section

Requested Change

1.8.d

Add the following phrase to the end of the sentence: "... when that component is out of service for a period of time exceeding that allowed by the Limiting Conditions for Operation."

The intent of this proposed change is to delete the requirement for immediate reporting as defined in Abnormal Occurrence notification procedures, when a failed component is returned to service within its allowed out-of-service time limit as stated by a limiting Condition for Operation. This request is based on the 10CFR50 definition of Limiting Conditions for Operation as "... the lowest functional capability or performance levels of equipment required for safe operation of the facility." The time limits specified in Section 3.0 of the Technical Specifications have been set based on the FSAR safety analyses and, beyond that, good engineering practice. When these limits are met, safe operation of the plant is assured.

It should be recognized that for some equipment no out-of-service time is allowed by the Limiting Conditions for Operation, and immediate reporting is mandatory. However, for other equipment certain out-of-service time is allowed for purposes of maintenance with no reporting requirements. We feel that an equivalent situation exists when the equipment has failed in service, is repaired, and is returned to service within the time limit. Safety of the plant is not compromised and immediate reports should not be required.

Mr. John F. O'Leary

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April 11, 1974

It is our opinion that an event should not be categorized as an abnormal occurrence unless there is an immediate safety concern. Events which have been evaluated by the AEC and conclusions previously reached by the AEC that the event does not result in unacceptable risks should not be classified as abnormal occurrences. The abnormal occurrence classification should be reserved for safety related events, which the AEC may wish to evaluate rapidly in order to insure that the event has or will not adversely affect safe operation of the facility.

With this change the term "Abnormal Occurrence" will have a more direct association with safety significant events and in the long run will improve the safe operation of our plants. This improvement will come from better time utilization of all people involved in plant operation and review and a greater awareness by all, including plant operators, that an abnormal occurrence is an event which has not previously been evaluated and approved as a condition for operation.

It is believed that approval of this change will place greater emphasis on safety significant occurrences, will eliminate nonproductive reporting and will at the same time continue to protect the health and safety of the public.

Yours very truly,



E. E. Utley
Vice-President
Bulk Power Supply

ACT:DBW:mvp

cc: Messrs. N. B. Bessac
B. J. Furr
W. B. Howell
D. V. Menscer
D. B. Waters