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CONTROL NO: 4074

FILE:

FROM: Carolina Power & Light Company Raleigh, N. C. 27602 E. E. Utley			DATE OF DOC 6-15-73	DATE REC'D 6-25-73	LTR X	MEMO	RPT	OTHER
TO: Mr. Schemel			ORIG 3 signed	CC	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D		DOCKET NO:		
	X		X	40		50-261		

DESCRIPTION:
Ltr requesting change to Tech Specs re the clarification of surveillance requirements....

ENCLOSURES:

Do Not Remove
ACKNOWLEDGED

PLANT NAME: H. B. Robinson Unit No. 2

FOR ACTION/INFORMATION 6-25-73 AB

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✓ <u>AEC PDR</u>	HENDRIE	GRIMES	BROWN (E)	BRAITMAN
✓ OGC, ROOM P-506A	SCHROEDER	GAMMILL	DIGGS (L)	SALTZMAN
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CASE	KNIGHT	BALLARD	GOULBOURNE (E)	<u>PLANS</u>
GIAMBUSSO	PAWLICKI	SPANGLER	LEE (L)	MCDONALD
BOYD	SHAO		MAIGRET (L)	✓ DUBE
MOORE (L)(EWR)	STELLO	<u>ENVIRO</u>	SERVICE (L)	
DEYOUNG(L)(PWR)	HOUSTON	MULLER	SHEPPARD (E)	<u>INFO</u>
✓ SKOVHOLT (L)	NOVAK	DICKER	SMITH (L)	C. MILES
P. COLLINS	ROSS	KNIGHTON	TEETS (L)	
	IPPOLITO	YOUNGBLOOD	WADE (E)	✓ ALLEN CABELL
<u>REG OPR</u>	TEDESCO	REGAN	WILLIAMS (E)	
✓ <u>FILE & REGION(3)</u>	LONG	PROJECT LDR	WILSON (L)	
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S. TEETS ON 6-25-73		

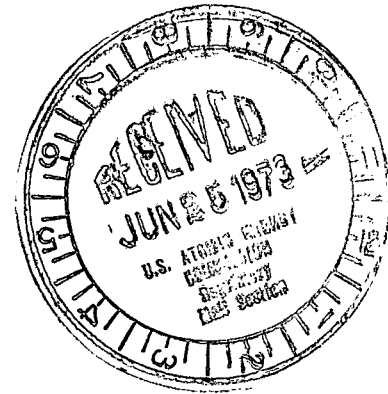


Carolina Power & Light Company

June 15, 1973

Mr. Robert J. Schemel, Chief
Operating Reactors, Branch #1
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

NG-73-107



Dear Mr. Schemel:

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

REQUEST FOR REVISION OF TECHNICAL SPECIFICATIONS
CLARIFICATION OF SURVEILLANCE TEST REQUIREMENTS

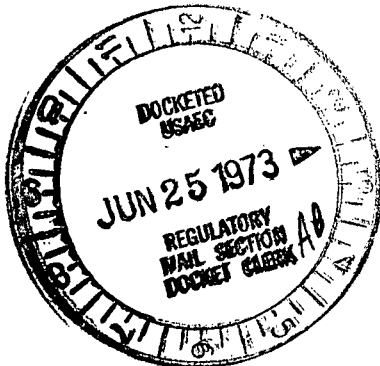
We have reviewed your letter of April 12, 1973, regarding our requested change of February 28, 1973, to Section 4.0 of the Technical Specifications. Carolina Power & Light Company intends to operate its nuclear plants in strict accordance with Technical Specifications and the surveillance requirements therein. The change proposals which follow are meant to give relief from certain surveillance requirements when the affected system or closely related systems are undergoing maintenance which prevents performance of the test or when plant conditions cause the tests to be impossible or inappropriate to perform. These changes would in no way compromise the assurance of health and safety of the public. Clarifying and more accurately defining the surveillance test frequencies affords stricter compliance to the specifications by the Licensee and more definitive and exacting audits by regulatory bodies.

Section

4.0

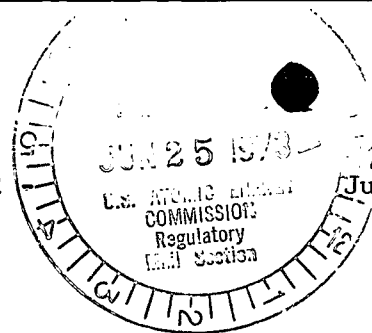
Requested Change

Add the following after the first sentence of this paragraph: "Performance of any surveillance test outlined in these specifications is not required if maintenance is being performed on that system or a closely associated system such that satisfactory completion of that test is precluded. A surveillance test not performed due to maintenance work shall be performed prior to returning that system to normal operation."



Mr. Robert J. Schemel

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Safety Analysis

It is Carolina Power & Light's intention to perform all surveillance tests required by the Technical Specifications; however, it is not always possible to perform some tests at the required interval if that system or a closely associated system is undergoing maintenance. Examples of this are tests of the turbine valves during maintenance of the electro-hydraulic system and tests of the safety injection pumps during maintenance on the pumps or related piping. The requested change pertains primarily to an extended shutdown such as a refueling outage or a major turbine overhaul when some systems are out of service for maintenance. In accordance with the H. B. Robinson Overall Plant Operating Procedure, GP-1, any necessary surveillance tests are performed prior to plant heat-up, criticality and power operations as applicable. This ensures that all required surveillance tests are performed as necessary to ensure plant safety.

SectionRequested Change

Table 4.1-1 Item No. 1 Note (3)

Change Note 3 to read "Upper and lower chambers for symmetric off-set during power operations."

Safety Analysis

The periodic test and calibration for power range symmetric offset is not necessary for plant safety and does not provide any useful information when the plant is shutdown or critical below the power range. This is consistent with the requirement for thermal power calculations only during power operation.

SectionRequested Change

Table 4.1-1 Item No. 27

Under the column entitled "Test" add note 1 as follows: "(1) During hot shutdown and power operations."

Safety Analysis

The reactor protection logic channels must presently be tested monthly in accordance with Table 4.1-1, Item No. 27 of the Technical Specifications. Performance of this test when the plant is in the cold shutdown condition is extremely difficult since many plant conditions must be simulated which does not provide for a meaningful test. If necessary, this test is performed prior to critical operations in accordance with Operating Procedure GP-1.

SectionRequested Change

Table 4.1-3, Item No. 9

Under the column entitled "Frequency" Change the requirement to read "Daily when reactor coolant system is stable above cold shutdown condition."

Mr. Robert J. Schemel

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Safety Analysis

Reactor coolant system leakage evaluation is presently required to be evaluated daily in accordance with Table 4.1-3, Item No. 9 of the Technical Specifications. Performance of this surveillance requirement is not necessary when the plant is in cold shutdown since the plant is already in a condition which would satisfy the failure criteria of the test, and plant safety is assured. Performance of this requirement during plant conditions other than stable operation, such as heat-up or cool-down, yields meaningless information since plant parameters are constantly changing. In addition, reactor coolant system leakage to the containment atmosphere would be detected by the Containment Air Particulate Monitor, Containment Radiogas Monitor, the Containment Humidity Detector, and the HVH Condensate Collection System. Leakage to another closed system is detected by radiation monitoring equipment.

SectionRequested Change

Table 4.1-3, Item No. 12

Under the column entitled "Frequency" change the requirement to read: "Monthly during power operations."

Safety Analysis

The turbine steam stop, control, reheat stop and interceptor valves are presently checked monthly for closure in accordance with Table 4.1-3, Item No. 12 of the Technical Specifications. Performance of this test when the plant is shutdown is unnecessary since the valves are tested prior to startup in accordance with Operating Procedure, GP-1.

SectionRequested Change

4.5.2.1

Add second sentence to read "Tests of the safety injection and containment spray pumps are not required if the plant is in cold shutdown."

4.5.2.3

Add second sentence to read "Test of these valves is not required if the plant is in cold shutdown."

Safety Analysis

Use of the Safety Injection System is not required by any safety analysis when the plant is in a cold shutdown condition. Normal practice, as recommended by Westinghouse, is to disable the safety injection pump breakers when in a cold shutdown condition. Technical Specification 3.2.1 assures that, when fuel is in the reactor, there shall be at least one flow path to the core for boron injection with a minimum boric acid injection capability equivalent to that supplied from the refueling water storage tank. This is supplied through the Chemical and Volume Control System.

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Section

Requested Change

4.8.2

Add the following to the first sentence.
"When the plant is above the cold shutdown
condition."

Safety Analysis

The steam turbine driven auxiliary feedwater pump must presently be test run at intervals not to exceed one month in accordance with Technical Specification 4.8.2. This pump cannot be tested at the required interval if the plant is in a cold shutdown condition due to the absence of a motivating steam supply. If necessary, this test is performed as required by Operating Procedure GP-1 prior to plant startup.

Very truly yours,



E. E. Utley
Vice-President
Bulk Power Supply

KEB:DBW:mp

cc: Mr. C. D. Barham
Mr. N. B. Bessac
Mr. B. J. Furr
Mr. D. V. Menscer
Mr. D. B. Waters