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Carolina Power & Light Company Raleigh, N. C. 27602 E. E. Utley		11-30-72	12-5-72	X			
TO:		ORIG	CC	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
Mr. Skovholt		1					
CLASS: (U) PROP INFO		INPUT	NO CYS REC'D	DOCKET NO:			
			1	50-261			

DESCRIPTION:
Ltr re our 9-28-72 ltr.....submitting proposed revisions to Tech Specs & trans the following:

ENCLOSURES:
Proposed revision to Administrative Controls Sec of H. B. Robinson Unit # 2 Tech Specs, Sec. 6.6

PLANT NAMES: H. B. Robinson

(1 cy of encl rec'd)

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ACKNOWLEDGED**

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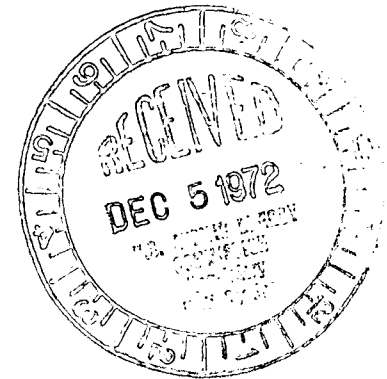


Carolina Power & Light Company

November 30, 1972

Regulatory

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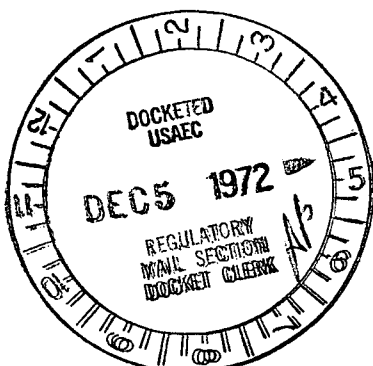
Mr. Donald J. Skovholt
Assistant Director of Operating Reactors
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

PROPOSED REVISIONS TO THE ADMINISTRATIVE
CONTROLS SECTION OF THE H. B. ROBINSON
UNIT NO. 2 TECHNICAL SPECIFICATIONS
DOCKET NO. 50-261

Dear Mr. Skovholt:

In order to conform as nearly as possible to the "suggested Technical Specifications that cover the Plant Reporting Requirements", Carolina Power & Light Company has prepared a proposed revision to Section 6.6 of the Technical Specifications for the H. B. Robinson Unit No. 2. The proposed revision closely follows the enclosures in your letter to Mr. J. A. Jones of September 28, 1972. Subjects not included in your "suggested Technical Specifications" but are presently incorporated in the Robinson Technical Specifications have been included in the proposed revision. Those subjects which Carolina Power & Light has rephrased or does not propose to adopt are as follows:

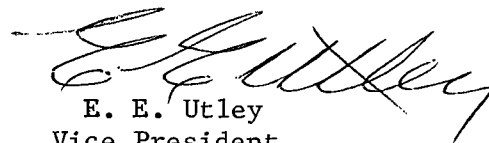
- I. 6.6.1.a.(3)(a)(iv) - "results of surveillance tests and inspections required by these technical specifications". Routine tests (PT's) should not be included.
- II. 6.6.1.a.(3)(d)(v) - delete "precautions taken to provide for reactor safety during repair". Precautions will be taken in accordance to other sections of the Technical Specifications and administrative procedures. If there is a deviation from the Technical Specifications, it will be reported. (for example, see Sections 3.2.3 and 3.2.4)
- III. 6.6.1.a.(3)(g)(i) - add "(summarized on semi-annual basis)". The Environmental Monitoring Report is submitted to CP&L by its consultant once every six months.
- IV. 6.6.2.a.(1) - delete last paragraph. All abnormal occurrences are listed chronologically in the Semi-annual Report. Related occurrences may be reviewed in this list.



- V. 6.6.2.b.(3) - delete "Any condition involving a possible single failure which, for a system designed against assumed single failures, could result in a loss of the capability of the system to perform its safety function". Reporting requirements for Energized Safety Systems component failures are presented in Section 3.
- VI. In Table 6.6.1, it is proposed that the reporting requirements "Immediately and Promptly" be changed to 24 hours. Although both words are used in various 10 CFR parts, they do cause confusion. A 24-hour reporting requirement should eliminate this confusion.

Proposed revisions to the Administrative Controls Section of the H. B. Robinson Unit No. 2 Technical Specifications, Section 6.6, are hereby submitted to assure reporting consistency and to conform as nearly as possible to Safety Guides 16 and 21.

Yours very truly,



E. E. Utley
Vice President
Bulk Power Supply

JGC/za

Enclosure

cc: Mr. C. D. Barham
Mr. N. B. Bessac
Mr. B. J. Furr
Mr. S. Grant

6.6 PLANT REPORTING REQUIREMENTS

The following information shall be submitted by Carolina Power & Light Company in addition to the reports listed in Table 6.6-1 and required by Title 10, Code of Federal Regulations.

6.6.1 Routine Reports:

a. Operating Reports

Operations Reports shall be submitted in writing to the Deputy Director for Reactor Projects, Directorate of Licensing, USAEC, Washington, D. C. 20545.

(1) Startup Report

A summary report of unit startup and power escalation testing shall be submitted following receipt of operating licenses, following amendments to the licenses involving a planned increase in power level, following the installation of fuel that has a different design and/or has been manufactured by a different fuel supplier, or following modifications to an extent that the nuclear, thermal, or hydraulic performance of the unit may be significantly altered. The report shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation should be described. Startup reports shall be submitted within 60 days following commencement of commercial power operation, i.e., initially following synchronization of the turbo-generator to produce commercial power or resumption of commercial power operation.

(2) First Year Operation Report

A report shall be submitted within 60 days after completion of the first year of commercial power operation as defined above. This report may be incorporated into the semiannual operation report and shall cover the following:

- (a) an evaluation of unit performance to date in comparison with design predictions and specifications;
- (b) a reassessment of the safety analysis submitted with the license application in light of measured operating characteristics when such measurements indicate that there may be substantial variance from prior analyses;
- (c) an assessment of the performance of structures, systems and components important to safety;
- (d) a progress and status report on any items identified as requiring additional information during the operating license review or during the startup of the plant, including items discussed in the AEC's safety evaluation, items on which additional information was required as

conditions of the license and items identified in the licensee's startup report.

(3) Semiannual Operating Reports

Routine operating reports shall be submitted within 60 days after January 1 and July 1 of each year. The first such period should begin with the date of initial criticality. These reports should include the following:

(a) Operations Summary

A summary of operating experience occurring during the reporting period that relates to the safe operation of the plant, including a summary of:

- (i) changes in plant design
- (ii) performance characteristics (e.g., equipment and fuel performance),
- (iii) changes in procedures which were necessitated by (i) and (ii) or which otherwise were required to improve the safety of facility operations,

- (iv) results of surveillance tests and inspections required by these technical specifications,
- (v) the results of any periodic containment leak rate tests performed during the reporting period,
- (vi) a brief summary of those changes, tests and experiments requiring authorization from the Commission pursuant to 10 CFR 50.59(a), and
- (vii) any changes in the plant operating organization which involve positions which are designated as key supervisory personnel on Figure 6.1-2.

(b) Power Generation

A summary (summarized on a monthly basis) of power generated during the reporting period including:

- (i) gross thermal power generated (in MWH)
- (ii) gross electrical power generated (in MWH)

- (iii) net electrical power generated (in MWH)
- (iv) number of hours the reactor was critical
- (v) number of hours the generator was on-line
- (vi) histogram of thermal power vs. time
- (vii) equivalent full power hours

(c) Shutdowns

Descriptive material covering all outages occurring during the reporting period (summarized on a monthly basis). For each outage, information shall be provided on:

- (i) the cause of the outage,
- (ii) the method of shutting down the reactor; c.g., trip automatic rundown, or manually controlled deliberate shutdown,
- (iii) duration of the outage,
- (iv) unit status during the outage; e.g., cold shutdown or hot shutdown,
- (v) corrective action taken to prevent repetition, if appropriate.

(d) Maintenance

A discussion of safety-related maintenance (excluding preventative maintenance) performed during the reporting period on systems and components that are designated to prevent or mitigate the consequences of postulated accidents or to prevent the release of significant amounts of radioactive material. Included in this category are systems and components which are part of the reactor coolant pressure boundary defined in 10 CFR §50.2(v), any part of the engineered safety features, or associated service and control systems that are required for the normal operation of engineered safety features, part of any reactor protection or shutdown system, or part of any radioactive waste treatment handling and disposal system or other system which may contain significant amounts of radioactive material. For any malfunctions for which corrective maintenance was required, information shall be provided on:

- (i) the system or component involved,
- (ii) the cause of the malfunction,
- (iii) the results and effect on safe operation,

(iv) corrective action taken to prevent repetition,

(e) Changes, Tests and Experiments

A summary of all changes in the plant design and procedures that relate to the safe operation of the plant shall be included in the Operations Summary section of these semiannual reports. Changes, tests, and experiments performed during the reporting period that require authorization from the Commission pursuant to 10 CFR 50.59(a) are covered in paragraph 6.6.1.a(3)(a)(vi) of these technical specifications; however, those changes, tests, and experiments that do not require Commission authorization pursuant to §50.59(a) shall be addressed. The report shall include a brief description and the summary of the safety evaluation for those changes, tests, and experiments, carried out without prior Commission approval, pursuant to the requirements of §50.59(b) of the Commission's regulations, that "The licensee shall furnish to the Commission, annually or at such shorter intervals as may be specified in the license, a report containing a brief description of such changes, tests, and experiments, including a summary of the safety evaluation of each".

(f) Radioactive Effluent Releases

A statement of the quantities of radioactive effluents released from the plant, with data summarized on a monthly basis following the format of Appendix A of USAEC Safety Guide 21 of January 1972:

(i) Gaseous Effluents

(a) Gross Radioactivity Releases

- (1) Total gross radioactivity (in curies), including noble and activation gases released.
- (2) Maximum gross radioactivity release rate during any one-hour period.
- (3) Total gross radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.
- (4) Percent of technical specification limit.

(b) Iodine Releases

- (1) Total iodine radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.

- (2) Percent of technical specification limit for I-131 released.

(c) Particulate Releases

- (1) Gross radioactivity (B, γ) released (in curies) excluding background radioactivity.
- (2) Gross alpha radioactivity released (in curies) excluding background radioactivity.
- (3) Total gross radioactivity (in curies) of nuclides with half-lives greater than eight days.
- (4) Percent of technical specification limit for particulate radioactivity with half-lives greater than eight days.

(ii) Liquid Effluents

- (a) Gross radioactivity (B, γ) released (in curies) excluding tritium and average concentration released to the unrestricted area.

(iii) Solid Waste

- (a) The total amount of solid waste packaged (in cubic feet).
- (b) The total estimated radioactivity (in curies) involved.
- (c) The dates of shipment and disposition (if shipped offsite).

(g) Environmental Monitoring

- (i) For each medium sampled (summarized on semi-annual basis), e.g., air, baybottom, surface water, soil, fish including:
 - (a) Number of sampling locations,
 - (b) Total number of samples,
 - (c) Number of locations at which levels are found to be significantly above local backgrounds,
 - (d) Highest, lowest and the annual average concentrations or levels of radiation for the sampling point with the highest average and description of the location of that point with respect to the site.

(ii) If levels of radioactive materials in environmental media indicate the likelihood of public intakes in excess of 1% of those that could result from continuous exposure to the concentration values listed in Appendix B, Table II, Part 20, estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.

(iii) If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

(h) Occupational Personnel Radiation Exposure

A tabulation of personnel exposures shall be reported for the year (or first six months) in the following groups: less than 100 mRem, 100 - 500 mRem, 500 - 1250 mRem, 1250 - 2500 mRem, 2500 - 5000 mRem, above 5000 mRem. An explanation for all personnel exposures greater than 500 mRem in six months or the year shall be provided.

6.6.2 Non-Routine Reports

a. Reporting of Abnormal Events

(1) Abnormal Occurrence Reports

Notification shall be made within 24 hours by telephone or telegraph to the Director of the Regional Regulatory Operations Office, followed by a written report within 10 days to the Deputy Director for Reactor Projects, Directorate of Licensing (cc. to the Director of the Regional Regulatory Operations Office) in the event of the abnormal occurrences as defined in Section 1.0. The written report on these abnormal occurrences, and to the extent possible, the preliminary telephone or telegraph notification, shall: (a) describe, analyze and evaluate safety implications, (b) outline the measures taken to assure that the cause of the condition is determined, and (c) indicate the corrective action (including any changes made to the procedures and to the quality assurance program) taken to prevent repetition of the occurrence.

b. Reporting of Unusual Events

A written report shall be forwarded within 30 days to the Deputy Director for Reactor Projects, Directorate of Licensing (cc. to the Director of the Regional Regulatory Operations Office) in the event of:

- (1) Discovery of any substantial errors in the transient or accident analyses, or in the methods used for such analyses, as described in the Safety Analysis Report or in the bases for the technical specifications.
- (2) Any substantial variance from performance specifications contained in the technical specifications or in the Safety Analysis Report.
- (3) Any changes in plant organization as described in 6.1.3.
- (4) Observed inadequacies in the implementation of administrative or procedural controls.

6.6.3 Special Reports

Special reports shall be submitted in writing within 90 days to the Deputy Director for Reactor Projects, Directorate of Licensing, USAEC, Washington, D. C. 20545.

Special reports shall be submitted covering inspections, tests and maintenance that are appropriate to assure safe operation of the plant. The frequency and content of these special reports are determined on an individual case basis and designated in these technical specifications.

- (a) Reports on the following areas shall be submitted as noted:

<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
(1) Containment Leak Rate Testing (i)	4.4	Upon completion of each test
(2) Initial Containment Structural Test (ii)	4.4	Within three months following completion of test
(3) Fuel Inspection	2.1	Upon completion of the inspection at second and third refueling outages
(4) In-service Inspection Evaluation	4.2	After 5 years of operation
(5) Containment Sample Tendon Surveillance (iii)	4.4	Upon completion of the inspection at 5 and 25 years of operation
(6) Post-Operational Containment Structural Test (iii)	4.4	Upon completion of the test at 7 and 20 years of operation

- (i) Each integrated leak rate test shall be the subject of a summary technical report, which includes a schematic arrangement of the leakage measurement system, the pressure, temperature, and humidity instrumentation employed including their sensitivity, the test procedure, test results in graphical and tabular form and the analysis and interpretation of leakage rate results in meeting the allowable leakage rates specified in the license. Summaries

of local leak test results shall be included in the same report to permit evaluation of local leak testing as compared to integrated leak rate testing.

- (ii) The initial containment structural test shall be the subject of a report which includes summary of measurements of deflections, strains, crack width, crack patterns observed and detailed observations around tendon anchorage zones, as well as comparisons with predicted values of acceptance criteria.
 - (iii) Notification of the pending test, either of a sample tendon or the containment, along with a detailed acceptance criteria shall be forwarded to the Atomic Energy Commission two months prior to the actual test. A report and evaluation shall be submitted to the AEC within six months of conducting the test.
- (b) An analysis and report shall be submitted to the AEC on all surveillance specimens removed from the reactor vessel as described in Table 4.2.1. These reports shall include: (1) the information specified in ASTM E-185-66, "Recommended Practices for Surveillance Tests on Structural Materials in Nuclear Reactors"; (2) information obtained on the level of integrated fast neutron irradiation received by the specimens and the actual vessel material; and (3) revised limitations on startup, cooldown and operating conditions as designated by Technical Specification Figures 3.1-1 and 3.1-2 and how these revised limitations were evaluated.

TABLE 6.6-1

REPORTING SUMMARY

<u>Technical Specifications Paragraph</u>	<u>AEC Regulation</u>	<u>Report</u>	<u>Notification Within</u>	<u>Written Report Within ¹</u>			
				<u>10 Days</u>	<u>30 Days</u>	<u>6 Mo.</u>	<u>1 Yr.</u>
6.6	20.403(a)	Severe Accident Involving Licensed Material	24 hours		DRO		
6.6	20.402	Loss of Licensed Material	24 hours		DRO		
6.6	73.42	Special Nuclear Material Unaccounted for	24 hours ²				
6.6	40.64(c)	Theft or Unlawful Diversion of Source Material	24 hours ³				
6.6	70.52	Accidental Criticality or Loss of Special Nuclear Material	24 hours				
6.6	70.54	Transfer of Special Nuclear Material	24 hours ⁴				
		Receipt of Special Nuclear Material			AEC ⁴		
6.6	40.64(a)	Transfer of Source Material	24 hours ⁴				
		Receipt of Source Material			AEC ⁴		
6.6	20.403(b)	Accidents Involving Licensed Material	24 hours		DRO		
6.6	20.405(a)	Overexposure or Excessive Radiation Level			DRO		

TABLE 6.6-1 (Continued)

REPORTING SUMMARY

<u>Technical Specifications Paragraph</u>	<u>AEC Regulation</u>	<u>Report</u>	<u>Notification Within</u>	<u>Written Report Within ¹</u>			
				<u>10 Days</u>	<u>30 Days</u>	<u>6 Mo.</u>	<u>1 Yr.</u>
6.6	20.408	Personnel Exposure (Terminated Employees)			DR ⁵		
6.6	70.53	Special Nuclear Material Status				AEC ⁴	
6.6	20.407	Personnel Exposure and Monitoring					DR
6.6.3.e	50.59(d)	Changes, Test, and Experiments	DL ⁷				
6.6.3.f	Proposed Appendix Part 50	Containment Leak Rate	DL ⁸				

1 DR - Director of Regulation, DL - Directorate of Licensing, DRO - Directorate of Regulatory Operations

2 See 10CFR73.42 for details on reporting times.

3 See 10CFR40.64(c) for details on reporting times.

4 U. S. Atomic Energy Commission, P.O. Box E, Oak Ridge, Tennessee 37830

5 Within 30 days after determining exposure or 90 days after termination, whichever is earlier.

6 Within 60 days following completion of testing or commencement of commercial power operation, whichever comes first.

7 AEC authorization is required prior to performing the change, test, or experiment in this category.

8 Report on first test due 3 months after completion of test; notification of other tests depends on test results.