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DESCRIPTION:

Ltr notarized 7-25-75.....trans the following:

ACKNOWLEDGED

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PLANT NAME: Robinson #2

ENCLOSURES:

Amdt to OL/Change to Tech Specs: Consisting of proposed amdt to tech specs with regard to the operability of the automatic containment isolation trip valves....(40 cys encl rec'd)

FOR ACTION/INFORMATION 8-8-75 ehf

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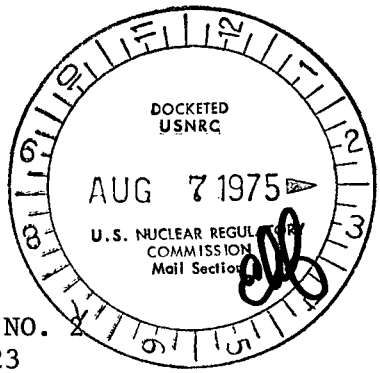
CP&L
Carolina Power & Light Company

July 25, 1975

FILE: NG-3514 (R) SERIAL: NG-75-1137

50-261



Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Rusche:

H. B. ROBINSON UNIT NO. 2
LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT - REVISION OF TECHNICAL SPECIFICATIONS

In accordance with the Code of Federal Regulations, Title 10, Carolina Power & Light Company herewith submits a proposed revision to the Technical Specifications for its H. B. Robinson Unit No. 2 plant. The revision, attached to this letter in the form of page changes, proposes changes to the requirements for operability of the automatic containment isolation trip valves.

During the recent reactor coolant pump seal failure incident at the Robinson Plant, one of the automatic containment isolation valves in the Component Cooling Water System, valve CCW-626, was taken out of service and blocked open to maintain cooling water flow to the thermal barriers of the reactor coolant pumps. The valve was caused to close due to the water in the "C" reactor coolant pump thermal barrier flashing to steam and causing spurious indication of high flow in the cooling water return line.

The action of blocking the valve open resulted in a violation of Technical Specification 1.7.d, in that containment integrity was inadvertently violated by the valve being inoperable, and a violation of Specification 3.6.1.a in that the plant was at a condition other than cold shutdown with containment integrity violated.

In reviewing the above referenced specifications following the incident, we have noticed that any malfunction of the automatic containment isolation valves, no matter how rapidly it was corrected, would require the plant to be placed in or started toward a cold shutdown condition in order to avoid violations of Technical Specifications. We feel that this requirement is overly restrictive, since valves do malfunction occasionally, requiring maintenance that could usually be performed at power. In addition, redundancy

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is provided in the isolation valves to meet single failure criteria so that safety requirements would not be compromised for short periods of time to effect repairs to an inoperable valve or to correct system conditions. The restrictive nature of a requirement such as now exists in the Robinson Technical Specifications has obviously been realized by the Commission in your development of the Standard Technical Specifications (STS). In these documents, out of service times for automatic containment isolation valves have been recognized to provide operating flexibility. In light of this approach, the attached proposed revision has adapted the appropriate sections of the STS for inclusion in the Robinson Technical Specifications.

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

DBW:bn

Attachment

cc: Messrs. N. B. Bessac
T. E. Bowman
P. W. Howe
J. A. Jones
R. E. Jones
W. B. Kincaid
J. B. McGirt
D. B. Waters

Sworn and subscribed before me this 25th day of July, 1975.

My Commission expires: July 4, 1980.

Margaret M. Cox
Notary Public

1.6.2 Channel Functional Test

Injection of a simulated signal into the channel to verify that it is operable, including alarm and/or trip initiating action.

1.6.3 Channel Calibration

Adjustment of channel output such that it responds, with acceptable range and accuracy, to known value of the parameter which the channel measures. Calibration shall encompass the entire channel, including alarm or trip, and shall be deemed to include the channel functional test.

1.7 Containment Integrity

Containment integrity is defined to exist when:

a. All non-automatic containment isolation valves not required for normal operation are closed and blind flanges are properly installed where required.

b. The equipment door is properly closed and sealed.

c. At least one door in the personnel air lock is properly closed and sealed.

d. All automatic containment isolation trip valves are operable or are secured closed except as stated in Specification 3.6.3. Manual valves qualifying as automatic containment isolation valves are secured closed.

e. The uncontrolled containment leakage satisfies Specification 4.4.

1.8 Abnormal Occurrence

Any of the following:

a. A safety system setting less conservative than the limiting setting established in the Technical Specifications.

3.6.2 Internal Pressure

If the internal pressure exceeds 2 psi or the internal vacuum exceeds 1.0 psi, the condition shall be corrected within 8 hours or the operator shall start to place the reactor in the hot shutdown condition utilizing normal operating procedures.

3.6.3 Containment Automatic Isolation Trip Valves

With one or more of the automatic containment isolation trip valves inoperable, either:

a. Restore the inoperable valve(s) to operable status within 4 hours, or

b. Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or

c. Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s), or

d. Be in cold shutdown within the next 36 hours.

Basis:

The Reactor Coolant System conditions of cold shutdown assure that no steam will be formed and hence there would be no pressure buildup in the containment if the Reactor Coolant System ruptures.

The shutdown margins are selected based on the type of activities that are being carried out. The 10% $\Delta K/K$ shutdown margin during refueling precludes criticality under any circumstances, even though fuel is being moved. When the reactor head is not to be removed, the specified cold shutdown margin of 1% $\Delta K/K$ precludes criticality in any occurrence.

Regarding internal pressure limitations, the containment design pressure of 42 psig would not be exceeded if the internal pressure before a major loss-of-coolant accident were as much as 4 psig.[1] The containment is designed to withstand an internal vacuum of 2.0 psi.[2]

References

(1) FSAR - Section 14.3.4

(2) FSAR - Section 5.1.2.3