10 CFR 50.90

CP&L
A Progress Energy Company

Serial: RNP-RA/01-0164

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United States Nuclear Regulatory Commission
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Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

REQUEST FOR TECHNICAL SPECIFICATION CHANGE TO
ELIMINATE REQUIREMENTS FOR THE POST-ACCIDENT SAMPLING SYSTEM

Ladies and Gentlemen:

In accordance with the provisions of the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L) is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed amendment revises TS 5.5.3, "Post-Accident Sampling," and Condition 3.G(4) of the Operating License.

Specifically, HBRSEP, Unit No. 2 proposes to delete TS 5.5.3, "Post-Accident Sampling," and thereby eliminate the requirement to have and maintain the PASS at HBRSEP, Unit No. 2. The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP). As discussed in the notice of availability for this TS improvement, this request also deletes Condition 3.G(4) of the Operating License.

Attachment I provides an affidavit as required by 10 CFR 50.30(b).

Attachment II provides a description of the current condition, a description of the proposed change, the requested confirmation of applicability, and plant-specific variations.

Attachment III provides a markup of the current Operating License and TS pages.

Attachment IV provides retyped pages for the proposed Operating License and TS.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the proposed license amendment.

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville, SC 29550

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CP&L requests approval of the proposed License Amendment by January 31, 2002, with the amendment being implemented upon completion of those activities necessary to implement the commitments identified herein. CP&L will notify the NRC by written correspondence upon implementation of the TS Amendment. The approval date was administratively selected to allow for NRC review, but the plant does not require this amendment to allow continued safe operation.

If you have any questions concerning this matter, please contact Mr. H. K. Chernoff.

Sincerely,

B. L. Fletcher III
Manager - Regulatory Affairs

CWS/cws

Attachments

I. Affidavit
II. Request for Operating License and Technical Specification Change Regarding Elimination of Requirements for the Post-Accident Sampling System
III. Markup of Current Operating License and Technical Specification Pages
IV. Retyped Current Operating License and Technical Specification Pages

c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. B. S. Mallett, NRC, Region II
Mr. A. G. Hansen, NRC, NRR
NRC Resident Inspector, HBRSEP
Attorney General (SC)

Affidavit

State of South Carolina
County of Darlington

J. W. Moyer, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/01-0164 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

JWMoyer

Sworn to and subscribed before me

this 31ST day of October 2001

C. A. Castell by Chad T. Baum

(Seal)
Notary Public for South Carolina

My commission expires:
October 10, 2010

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

REQUEST FOR OPERATING LICENSE AND TECHNICAL SPECIFICATION CHANGE REGARDING ELIMINATION OF REQUIREMENTS FOR THE POST-ACCIDENT SAMPLING SYSTEM

Description of Current Condition

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Technical Specifications (TS) identify that programs and manuals shall be established, implemented, and maintained for Post Accident Sampling. Specifically, TS Section 5.5, "Programs and Manuals," contains TS 5.5.3, "Post-Accident Sampling," that provides program requirements and controls to ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions.

Description of the Proposed Change

The proposed change would remove requirements for the Post Accident Sampling System (PASS). The two specific changes proposed are:

1) Delete the requirements of TS 5.5.3, and
2) Delete the requirements of Condition 3.G(4) of the Operating License.

Safety Assessment

Background:

The proposed changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF -366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

Applicability of Published Safety Evaluation:

Carolina Power & Light Company (CP&L) has reviewed the safety evaluation published on October 31, 2000, as part of the CLIIP. This review included the NRC staff's evaluation as well as the supporting information provided to support TSTF -366 (i.e., WCAP-14986, Revision 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted on October 26, 1998, and supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000). Please note that following NRC approval, WCAP-14986, Revision 2, was reissued as WCAP-14986-A, Revision 2, "Post Accident Sampling System Requirements:

A Technical Basis," dated July 2000. CP&L has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to HBRSEP, Unit No. 2, and justify this amendment for the incorporation of the changes to the HBRSEP, Unit No. 2, Operating License and TS.

Optional Changes and Variations:

The elimination of the TS and other regulatory requirements for PASS will result in one additional change to the Operating License.

HBRSEP, Unit No. 2 Operating License Condition 3.G(4) requires a program to ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include: training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis equipment. This Operating License Condition duplicates the requirements included in TS 5.5.3. CP&L proposes that Operating License Condition 3.G(4) be deleted, for consistency with the deletion of TS 5.5.3. This change does not revise technical requirements beyond those reviewed by the NRC staff in connection with the supporting topical report or TSTF-366.

Desired Implementation Period:

HBRSEP, Unit No. 2, proposes to implement the approved TS Amendment upon completion of those activities necessary to implement the commitments identified below. CP&L will notify the NRC by written correspondence upon implementation of the TS Amendment.

Verifications and Commitments:

As requested by the NRC staff in the notice of availability for this TS improvement, HBRSEP, Unit No. 2, provides the following verifications and commitments:

1. HBRSEP, Unit No. 2, will develop and maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. These contingency plans will be located in the Plant Operating Manual.

2. HBRSEP, Unit No. 2, currently has the capability for classifying fuel damage events at the Alert level threshold, i.e., 300 μCi/ml dose equivalent iodine, and will maintain this capability following elimination of PASS requirements. This capability may utilize the normal sampling system and/or correlations of sampling or letdown line dose rates to coolant concentrations. This capability is maintained in the emergency plan implementing procedures.

3. HBRSEP, Unit No. 2, currently has the capability to monitor radioactive iodines that have been released to offsite environs, and will maintain this capability following the elimination of PASS requirements. This capability is maintained in the Plant Operating Manual.

No Significant Hazards Consideration Determination

CP&L is proposing changes to the HBRSEP, Unit No. 2, Technical Specifications that will delete the requirements associated with the PASS in accordance with NRC approved Industry/TSTF Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)" as part of the consolidated line item improvement process.

CP&L has reviewed the proposed no significant hazards consideration determination published on October 31, 2000, as part of the CLIIP. CP&L has concluded that the proposed determination presented in the notice is applicable to HBRSEP, Unit No. 2, and the determination is hereby incorporated by reference to satisfy the requirement of 10 CFR 50.91(a).

Environmental Impact Consideration

CP&L has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIIP. CP&L has concluded that the NRC Staff's findings presented in that evaluation are applicable to HBRSEP, Unit No. 2, and the evaluation is hereby incorporated by reference for this application.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
REQUEST FOR OPERATING LICENSE AND TECHNICAL SPECIFICATION CHANGE REGARDING ELIMINATION OF REQUIREMENTS FOR THE POST-ACCIDENT SAMPLING SYSTEM

MARKUP OF CURRENT OPERATING LICENSE AND TECHNICAL SPECIFICATION PAGES

G. The following programs shall be implemented and maintained by the licensee:

(1) A secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include: the identification of critical parameters, their sampling frequency, sampling points and control band limits; requirements for the documentation and review of sample results; the identification of the authority responsible for the interpretation of sample results; the procedures used to measure the critical parameters; and the procedures which identify the administrative events and corrective actions required to return the secondary chemistry to its normal control band following an out of control band condition.

(2) A program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include: provisions for preventive maintenance and periodic visual inspection requirements, and integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

(3) A program to determine the airborne iodine concentration in vital areas under accident conditions. This program shall include: training of personnel, procedures for monitoring, and provisions for maintenance of sampling and analysis equipment.

(4) ~~A program to ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include: training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis equipment.~~

DELETED

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Residual Heat Removal, Safety Injection, Containment Spray, Post Accident Containment Ventilation; and portions of Chemical and Volume Control, Liquid Waste Disposal, Gaseous Waste Disposal, and Sampling. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at refueling cycle intervals or less.

DELETED

5.5.3 ~~Post Accident Sampling~~

~~This program provides controls to ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

~~a. Training of personnel;~~

~~b. Procedures for sampling and analysis; and~~

~~c. Provisions for maintenance of sampling and analysis equipment.~~

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of

(continued)

United States Nuclear Regulatory Commission
Attachment IV to Serial: RNP-RA/01-0164
3 Pages

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
REQUEST FOR OPERATING LICENSE AND TECHNICAL SPECIFICATION CHANGE REGARDING ELIMINATION OF REQUIREMENTS FOR THE POST-ACCIDENT SAMPLING SYSTEM

RETYPED OPERATING LICENSE AND TECHNICAL SPECIFICATION PAGES

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(3) A program to determine the airborne iodine concentration in vital areas under accident conditions. This program shall include: training of personnel, procedures for monitoring, and provisions for maintenance of sampling and analysis equipment.

(4) DELETED

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

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5.5.3 DELETED

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(continued)