

September 12, 1985

Docket No. 50-261

Mr. E. E. Utley, Senior Executive Vice President
Power Supply and Engineering & Construction
Carolina Power and Light Company
Post Office Box 1551
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<u>Distribution</u>	
Docket file	NRC PDR
ORB#1 RDG	L PDR
Gray file (4)	HThompson
CParrish	GRequa
OELD	LHarmon
EJordan	BGrimes
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WJones	MVirgilio
ACRS (10)	OPA, CMiles
RDiggs	

Dear Mr. Utley:

The Commission has issued the enclosed Amendment No. 95 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant Unit No. 2. This amendment consists of changes to the Technical Specifications in response to your request dated May 15, 1985.

The amendment revises the Technical Specifications to add requirements for: 1) shift manning overtime limits (NUREG-0737, Item I.A.1.3) and 2) reporting SV and RV failures and challenges (NUREG-0737, Item II.K.3.3). Your May 15, 1985 request was in partial response to Generic Letter 82-16.

We have completed our review of your responses to GL 82-16 and find all issues acceptable. We therefore consider the GL 82-16 issues closed.

One item of our review concerned the absence of Technical Specifications for allowable setpoints for the turbine trip signal because you do not take credit for these setpoints in your transient and accident analyses. Should you take credit for these setpoints in future transient and accident analyses we will require these to be included in your Technical Specifications.

A copy of the related Safety Evaluation and Technical Evaluation Report (TER) are enclosed. A Notice of Issuance will be included in the Commission's next regular bi-weekly Federal Register notice.

Sincerely,

Glode Requa, Project Manager
Operating Reactors Branch #1
Division of Licensing

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Enclosures:

1. Amendment No. 95 to DPR-23
2. Safety Evaluation
3. Technical Evaluation Report

cc: w/enclosures
See next page

ORB#1:DL	ORB#1:DL	ORAB	BC-ORB#1:DL	OELD	AD:OR:DL
CParrish	GRequa/ts	GHolahan	SVarga		GLainas
07/18/85	09/17/85	07/29/85	07/22/85	08/21/85	09/12/85

Mr. E. E. Utley
Carolina Power & Light Company

H. B. Robinson 2

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER AND LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 95
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power and Light Company (the licensee) dated May 15, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-23 is hereby amended to read as follows:

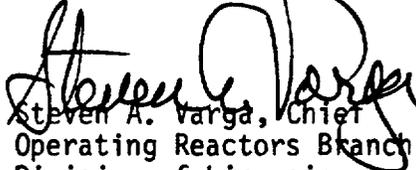
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(B) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 95, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 12, 1985

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 95 FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Revise Appendix A as follows:

Remove Pages

6.2-1

6.9-9

Insert Pages

6.2-1

6.2-1a

6.9-9

6.2 ORGANIZATION

Offsite

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

6.2.2 Definitions

- a) Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant staff.
- b) Personnel reporting to the Manager - Control and Administration shall be identified in Section 6 of the Technical Specifications as the C&A staff.

Facility Staff

6.2.3 The Robinson Nuclear Project organization shall be as shown in Figure 6.2-2 and:

- a) The shift complement during hot operations shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Senior Control Operator holding a Senior Reactor Operator's License, two Control Operators each holding a Reactor Operator's License, two additional shift members, and one Shift Technical Advisor. The limitations on the use of overtime applies to the HBR2 Shift Foremen, Senior-Control Operators, Control Operators, and Shift Engineers. These limitations apply only when HBR2 Reactor Coolant System is greater than 200 F or when fuel is being moved within the Reactor Pressure Vessel. These limitations may be applied to other key "safety" personnel as warranted by the plant conditions and other circumstances at the discretion of the Plant General Manager.

CP&L's overtime policy is summarized as follows:

- 1) An individual shall not be permitted to work more than 12 hours straight (not including shift turnover time).
- 2) An individual will have at least the same number of hours off between work periods as the length of his last work period (not including shift turnover time).
- 3) An individual shall not work more than 84 hours in any 7 day period (not including shift turnover time).
- 4) An individual shall not work more than 14 consecutive days without having two consecutive days off.

Under very unusual circumstances, deviations from above restrictions may be authorized by the Plant General Manager. When the overtime required exceeds the limitations described above, the circumstances must be documented.

- b) The shift complement during cold shutdown shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Control Operator holding a Reactor Operator's License and one additional shift member.
- c) At least one licensed Operator shall be in the control room when fuel is in the reactor.

6.9.2 Deleted

6.9.3 Special Reports

6.9.3.1 Special reports shall be submitted to the Regional Administrator of the NRC Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
a. Containment Leak Rate Testing	4.4	Upon completion of each test
b. Containment Sample Tendon Surveillance	4.4	Upon completion of the inspection at 25 years of operation
c. Post-operational Containment Structural Test	4.4	Upon completion of the test at 20 years of operation
d. Fire Protection System	3.14	As specified by limiting condition for operation
e. Overpressure Protection System Operation	3.1.2.1.e	Within 30 days of operation
f. Auxiliary Feedwater Pumps	3.4	Within 30 days after becoming inoperable
g. Primary Safety and Relief Valve Challenges		Annually prior to March 1 for previous calendar year



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 95 TO FACILITY OPERATING LICENSE NO. DPR-23

CAROLINA POWER AND LIGHT COMPANY

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

DOCKET NO. 50-261

I. Introduction

Generic Letter (GL) 82-16 contained guidance on certain NUREG-0737 items and acceptance criteria for associated Technical Specifications (TS). The licensee's submittal and the Technical Specifications for Robinson Unit No. 2, were reviewed. Technical assistance to Region II was provided under contract with EG&G. The contractor's Technical Evaluation Report (TER) No. EGG-EA-6437 documents their evaluation.

We have reviewed the contractor's TER and agree with the conclusion that there are seven items that apparently do not conform to the guidance contained in GL 82-16. Five of these have been reviewed as separate issues. The remaining two are: (1) Overtime Limits relying on Administrative Controls instead of specific Technical Specifications; and (2) Anticipatory Trip on T.T - failure to include the Turbine Trip in the protection system setting. This Safety Evaluation is concerned with the resolution of the seven open items contained in the EG&G TER No. EGG-EA-6437, Section 4 Conclusions.

II. Evaluation

The enclosed report (EGG-EA-6437) was prepared for us by EG&G Idaho, Inc. as part of our technical assistance contract program. Their report provides their technical evaluation of the compliance of the Licensee's submittal with NRC-provided criteria. Despite these "informal" notation, this is the final report of the contractor on this matter. This staff has reviewed this TER and agrees with the evaluation.

Based on the EG&G TER the licensee conforms to all issues addressed in Generic Letter 82-16 with the exception of the items listed and resolved in this evaluation (See Conclusions in the TER). Resolution of the seven unresolved items are as follows:

1. Section 3.1 STA Training I.A.1.1.3.--Until further guidance is provided by the Commission, no further licensing action can be taken to determine whether the exact training program for the STA is required to be in the TS.

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The staff concluded that the licensee's STA program is acceptable by letter dated January 15, 1982. Future Commission guidance concerning the STA training requirements, retraining and replacement will be handled as a plant specific issue, therefore, we consider this item closed.

2. Section 3.2 Shift Manning-Overtime Limits--The CP&L policy is contained in administrative procedures rather than in the TS and, as stated in their response, the CP&L policy deviates from the NRR criteria.

By letter dated May 15, 1985 the licensee requested a revision to Technical Specification 6.2.3; Facility Staff. The revision adds staff overtime limitations that the licensee previously had implemented by administrative procedures. The licensee's overtime policy was previously approved by NRC letter dated November 15, 1981. Subsequent to the November 5, 1981 approval, we required the licensee to incorporate their overtime limit policy into Technical Specifications. By letter dated May 15, 1985 the licensee requested the addition of the previously approval overtime policy into their TS. We conclude that the proposed changes are acceptable and therefore consider this item closed.

3. Section 3.4 Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)--The NRC is presently reviewing open items of the original Safety Evaluation pertaining to safety grade flow indication and initiation as a separate evaluation.

By NRC letter dated June 20, 1984, we approved the licensee's submittals concerning II.E.1.1 and II.E.1.2 open items with one exception. The only remaining concern was automatic bus transfer (ABT). This item is currently under staff review as a separate issue, TAC No. 55156, ABT for AFW initiation/flow. Therefore, we consider NUREG-0737 Item II.E.1.2. closed.

4. Section 3.6 Containment Pressure Setpoint II.E.4.2.5.--The licensee has submitted a TS change request to correct the containment pressure setpoint. This request is presently under review by the NRC.

By letter dated January 11, 1983 the licensee submitted a request to revise the containment pressure setpoints contained in their Technical Specification. The request was reviewed by the staff and approved by letter dated April 4, 1984 which issued Amendment No. 79. Therefore, we consider this item closed.

5. Section 3.7 Containment Purge Valves (II.E.4.2.6)--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item.

The requirement for this item is that for containment purge valves that do not satisfy the operability requirements ... the valves must be sealed closed ... and must be verified closed at least every 31 days. GL 82-16 requires technical specifications to assure that the valves are sealed closed and verified. By letter dated December 5, 1983 the staff approved

these valves as operable valves for the H. B. Robinson Unit 2 Plant. Therefore, technical specifications are not required for the Item II.E.4.2.6. non-operable valve criterion and we consider this item closed.

6. Section 3.8 Radiation Signal on Purge Valves (II.E.4.2.7.) The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item. A licensee submittal for this is presently under NRC review and licensing action may be required, following this review.

The staff review for this item was completed during our review of the Radiological Effluent Technical Specifications (RETS). The approval was by letter dated October 4, 1984 which issued Amendment No. 85. Therefore, we consider this item closed.

7. Section 3.12 Reporting Safety Valve and Relief Valve Failures and Challenges (II.K.3.3)--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item.

The licensee stated that challenges to the pressurizer PORV's and safety valves are included in the HBR-2 annual report and, therefore, including the reporting requirements in Technical Specifications (TS) was redundant and unnecessary. This position did not meet the NUREG-0737 item II.K.3.3 position. By letter dated May 15, 1985 the licensee submitted a request for TS change to add reporting of challenges to the safety and relief valves. GL 82-16 model TS for this item also required a Prompt Notification (PN) for failure of either valve. Subsequent to this requirement Title 10 of the Code of Federal Regulations published requirements for prompt (immediate) notification in Part 50.72; therefore, TS for these failures are no longer required. Based on our review of the licensee's submittal as discussed above we find the requested TS change acceptable and consider this item closed.

8. Section 3.13 Anticipatory Trips on Turbine Trips (II.K.3.12)--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item.

The licensee has anticipatory trip on turbine trip. Their TS contain LCO's for the turbine trip and surveillance testing. The turbine trip signal setpoints are not incorporated in the Technical Specifications. The licensee's basis for not including the setpoints in their TS is because credit is not taken for these in the transient and accident analysis. Since the transient and accident analysis has demonstrated that the plant is acceptably safe without taking credit for the turbine trip setpoints and since the licensee has in-place TS for LCO's and surveillance testing requirements for the turbine trip we find the licensee's current Technical Specification acceptable. However, should the licensee take credit for the turbine trip setpoints in future Chapter 15 events (transient and accident analysis), the licensee will be required to submit technical specifications incorporating these setpoints. Based on the enclosed TER and the above discussion we find this item acceptable and consider this item closed.

III. Summary

The staff and its contractor have reviewed all GL 82-16 issues and the licensee's resolution for the issues and find them acceptable. Therefore, we consider the NUREG-0737 issues contained in GL 82-16 closed.

IV. Environmental Consideration

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

V. Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: September 12, 1985

Principal Contributors:

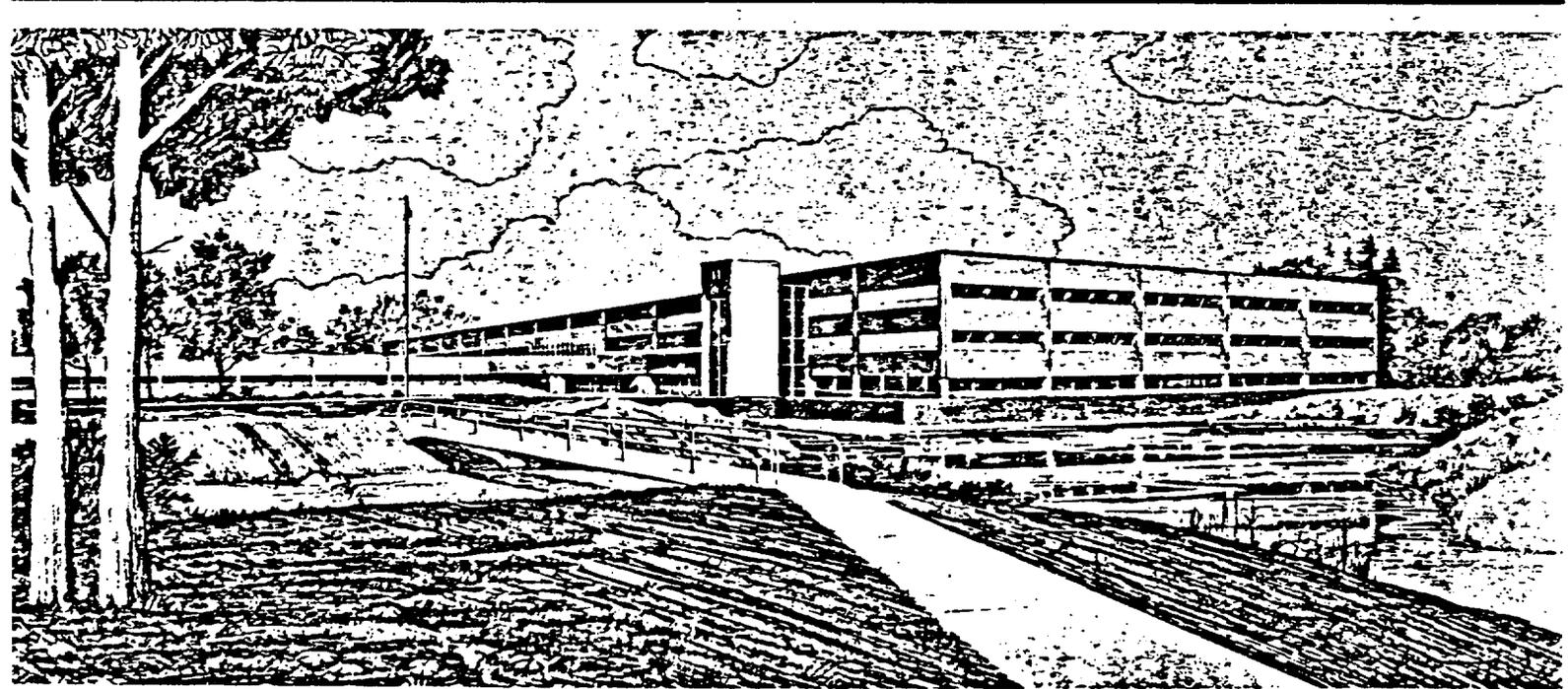
R. C. Lewis, RII
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Enclosure
EGG-EA-6437
DECEMBER 1983

CONFORMANCE TO NRR GENERIC LETTER 82-16
H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2

D. M. Beahm

Idaho National Engineering Laboratory
Operated by the U.S. Department of Energy



This is an informal report intended for use as a preliminary or working document

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Prepared for the
U. S. NUCLEAR REGULATORY COMMISSION
Under DOE Contract No. DE-AC07-761D01570
FIN No. A6600

 **EG&G** Idaho

CONFORMANCE TO NRR GENERIC LETTER 82-16
H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2

David M. Beahm

Published December 1983

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Prepared for the
U.S. Nuclear Regulatory Commission
Atlanta, Georgia 30303
Under DOE Contract No. DE-AC07-76ID01570
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ABSTRACT

This EG&G Idaho, Inc., report evaluates the submittal provided by Carolina Power and Light Company (CP&L) for H. B. Robinson Steam Electric Plant Unit 2 (HBR-2). The submittal is in response to Generic Letter No. 82-16, "NUREG-0737 Technical Specifications (TS)." Applicable sections of the plant's TS are evaluated to determine compliance to the guidelines established in the generic letter.

FOREWORD

This report is supplied as part of the "Technical Assistance for Operation Reactors Licensing Actions" being conducted for the U.S. Nuclear Regulatory Commission Region II by EG&G Idaho, Inc., NRC Licensing Support Section.

The U.S. Nuclear Regulatory Commission Funded the work under authorization B&R 92-19-20-10, FIN No. A6600.

Docket No. 50-261

TAC No. 49753

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CONFORMANCE TO NRR GENERIC LETTER 82-16
H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2

1. INTRODUCTION

On September 20, 1982, Generic Letter 82-16¹ was issued by D. G. Eisenhut, Director of Licensing, Office of Nuclear Reactor Regulation (NRR), to all pressurized power reactor licensees. This letter identified a number of items which were required by NUREG-0737² to be implemented into the licensee's Technical Specifications (TS) by December 31, 1981. Each licensee was requested to review his facility's TS, to address areas of compliance, and to identify deviations or absence of a specification for the items identified in the generic letter, within 90 days of receipt of the letter.

The Carolina Power and Light Co (CP&L), the licensee for H. B. Robinson Steam Electric Plant Unit 2 (HBR-2), provided a response to the generic letter on December 23, 1982.³

This report provides an evaluation of the licensee's TS and Nuclear Regulatory Commission (NRC) correspondence with the licensee pertaining to those items identified in the generic letter.

2. REVIEW REQUIREMENTS

The review consists of evaluating the licensee's response, currently approved TS, and other NRR approvals against the criteria set forth in Generic Letter 82-16. The NUREG-0737 items and the criteria established are as follows:

2.1 STA Training (I.A.1.1.3)

The licensee is to address within his TS that a shift technical advisor (STA) to the shift supervisor is provided. In addition, the qualifications, training, and on-duty requirements for the STA should be stated.

2.2 Shift Manning-Overtime Limits (I.A.1.3.1)

The licensee is to provide changes to his TS providing overtime administrative procedure and staffing requirements. The following guidelines were established for the licensee by the NRC.

- "a. An individual should not be permitted to work more than 16 hours straight (excluding shift turnover time).
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period (all excluding shift turnover time).
- c. A break of at least eight hours should be allowed between work periods (including shift turnover time).
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Recognizing that very unusual circumstances may arise requiring deviation from the above guidelines, such deviation shall be authorized by the plant manager or his deputy, or higher levels of management. The paramount consideration in such authorization shall be that significant reductions in the effectiveness of operating personnel would be highly unlikely.

In addition, procedures are encouraged that would allow licensed operators at the controls to be periodically relieved and assigned to other duties away from the control board during their tour of duty."⁴

2.3 Short Term Auxiliary Feedwater System (AFWS) Evaluation (II.E.1.1)

The objective of this item is to improve the reliability and performance of the auxiliary feedwater (AFW) system. TS depend on the results of the licensee's evaluation and the staff review, and are being developed separately for each plant. The limiting conditions of operation (LCO's) and surveillance requirements for the AFW system should be similar to other safety-related systems.¹

2.4 Safety Grade AFW Initiation and Flow Indication (II.E.1.2)

The AFW system automatic initiation system was to have been control grade by June 1, 1980, and safety grade by July 1, 1981; the AFW system flow indication was to have been control grade by January 1, 1980, and safety grade by July 1, 1981.¹

2.5 Dedicated Hydrogen Penetrations (II.E.4.1)

Plants that use external recombiners or purge systems for post-accident combustible gas control of the containment atmosphere should provide containment penetrations dedicated to that service. In satisfying this item, some plants may have to add some additional piping and valves. If so, these valves should be subjected to the requirements of Appendix J of 10 CFR 50, and the TS should be modified accordingly.¹

2.6 Containment Pressure Setpoint (II.E.4.2.5)

The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and the NRC has approved their justification by separate

correspondence. The remaining plants must submit a change to the TS with the lower containment pressure setpoint and provide justification if this setpoint is more than 1 psi above maximum expected containment pressure during normal operation.¹

2.7 Containment Purge Valves (II.E.4.2.6)

Model TS were sent separately to each plant as part of the overall containment purge review. These TS include the requirement that the containment purge valves be locked closed except for safety related activities, verified closed at least every 31 days, and be subjected to leakage rate limits.¹

2.8 Radiation Signal on Purge Valves (II.E.4.2.7)

The containment purge valves must close promptly to reduce the amount of radiation released outside containment following a release of radioactive materials to containment. TS should include the requirement that at least one radiation monitor that automatically closes the purge valves upon sensing high radiation in the containment atmosphere be operable at all times except cold shutdowns and refueling outages. If not operable, either the plant should begin proceeding to cold shutdown within 24 hours or the purge valves should be closed within 24 hours. Model TS were provided in Standard Technical Specifications format for those plants that are using safety-grade components to satisfy the requirement.¹

2.9 Upgrade Babcock and Wilcox (B&W) AFWS (II.K.2.8)

Additional long-term AFWS modifications were to be performed in conjunction with Generic Letter 82-16 Items 3 and 4 (2.3 and 2.4 above). The TS implemented for Items 3 and 4 will also address the upgrade of the B&W AFWS; therefore no separate TS changes would be required for this item for the B&W plants.

2.10 B&W Safety-Grade Anticipatory Reactor Trip (II.K.2.10)

Safety-grade turbine trip equipment initiating a reactor trip was to be implemented by the B&W designed plants as part of the TMI lessons learned. The licensee is to implement in the TS the trip setpoint, number of channels, trip conditions, minimal channels required for operation, applicable operation modes, actions to be taken, surveillance required and any other requirements for safety-grade equipment.

2.11 B&W Thermal-Mechanical Report (II.K.2.13)

Licensees of B&W operating reactors were required to submit by January 1, 1981, an analysis of the thermal-mechanical conditions in the reactor vessel during recovery from small breaks with an extended loss of all feedwater. TS, if required, will be determined following NRC staff review.¹

2.12 Reporting Safety and Relief Valve Failures and Challenges (II.K.3.3)

NUREG-0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of the TS that discuss reporting requirements should be changed accordingly. The NRC has noted that an acceptable alternative would be to report challenges monthly.¹

2.13 Anticipatory Trip on Turbine Trip (II.K.3.12)

Licensees with Westinghouse-designed operating plants have confirmed that their plants have an anticipatory reactor trip upon turbine trip. Many of these plants already have this trip in the TS. For those that do not, the anticipatory trip should be added to the TS.¹

For HBR-2 the above Items 2.9, 2.10, and 2.11 are not being evaluated. Being a Westinghouse design, Items 2.9, and 2.10 are not applicable for HBR-2. For Item 2.11, the Thermal-Mechanical report is being evaluated by the NRC staff as a separate active Three Mile Island (TMI) action item.

3. EVALUATION

The evaluations of Generic Letter 82-16 Items are as follows:

3.1 STA Training (I.A.1.1.3)

The licensee stated that amendment 59 to the HBR-2 license, which was issued on August 24, 1981, included the qualification and training requirements for STA's. A review of the licensee TS⁵ shows the STA position is a part of the shift complement in Figure 6.2-2. Section 6.3.3 of the TS states that the STA shall have a bachelor's degree or equivalent in a scientific or engineering discipline, with specific training in plant design, and in the response and analysis of the plant for transients and accidents. The exact training program is not in the TS; however, the retraining and replacement program is covered in Section 6.4.1 of the TS.

In a letter from the NRC to CP&L, dated January 15, 1982,⁶ the NRC provided a post-implementation review of the CP&L STA training program. The NRC concluded that the CP&L STA training program is acceptable in meeting the intent of the guidelines set forth. Until further guidance is issued by the Commission, no further licensing action is required for this item.

3.2 Shift Manning--Overtime Limits (I.A.1.3.1)

The licensee's response to this item states that "the CP&L policy regarding nuclear power plant staff working hours, which was submitted to the NRC, February 26, 1981, and approved by the NRC in a letter, dated November 5, 1981, is consistent with the intent of the commission policy as clarified in Generic Letter 82-12. The difference is that individuals are not permitted by CP&L policy to work more than 12 hours straight, rather than 16 and they are allowed to work 84 hours in a seven day period, rather than 72 hours." The policy is included in the CP&L administrative procedures rather than the TS.

Since the CP&L policy is a deviation to the NRR criteria of Generic Letter 82-12, we recommend this item be evaluated as a separate issue. Technical Assignment Control System (TAC) number 44124 has been assigned for active action of this item.

3.3 Short Term Auxiliary Feedwater System (AFWS) Evaluation (II.E.1.1)

The licensee's response to this item states that an application to amend the existing operability requirements for the AFW system was made October 1, 1982. By a letter to CP&L, dated January 6, 1983,⁷ the NRC issued amendment number 74 for HBR-2 and a safety evaluation of the AFW system which found that the licensee has met the requirements of NUREG-0737, Item II.E.1.1. Our review of the HBR-2 TS, Sections 3.4 and 4.8, indicate that the limiting conditions for operation and the surveillance requirements are similar to the other related safety systems specified in the HBR-2 TS, thereby complying with the requirements of Generic Letter 82-16. No further licensing action is necessary for this item.

3.4 Safety Grade AFW Initiation and Flow Indication (II.E.1.2)

By a letter to CP&L, dated January 6, 1983,⁷ which discussed both the II.E.1.1 and II.E.1.2 issues, the NRC stated that open items of the original Safety Evaluation concerning safety grade flow indication and automatic initiation are under review and will be provided as a separate evaluation under TMI Item II.E.1.2 of NUREG-0737. Further licensing action may be required for this item following the NRC review. TAC number 44689 has been assigned for AFW Safety Grade automatic initiation and TAC number 44728 for the AFW Safety Grade Flow indication.

3.5 Dedicated Hydrogen Penetrations (II.E.4.1)

The licensee's response states, "The dedicated hydrogen penetration for HBR-2 was provided via an existing containment penetration, that no modifications or additional valves are required for the containment penetration; therefore, no valves need to be added to the TS for Appendix J testing."

The licensee TS do not contain information which relates specifically to the hydrogen penetrations or Appendix J testing. FSAR Chapter-6, Table 6.2.4.1, lists the containment piping penetrations and valving, and identifies the containment vent system valves which are used for post accident gas control of the containment atmosphere. TS paragraph 4.4.2 and FSAR Chapter 6 paragraph 6.2.6.3 indicate that the isolation valves are subject to testing requirements of 10 CRF 50, Appendix J. We conclude that the Generic Letter 82-16 requirements for this item have been satisfied and no further licensing is required.

3.6 Containment Pressure Setpoint (II.E.4.2.5)

The licensee's response states that justification for not changing the containment pressure setpoint for HBR-2 had been found acceptable by the NRC, as indicated in a letter to CP&L dated December 21, 1981.⁸ The licensee further stated that CP&L has discovered an error in the calculation of the containment net free volume used in the FSAR. Subsequently, CP&L has determined that a TS change is required and submitted a TS change request on January 1, 1983, to correct the containment pressure setpoint. This item is being evaluated by the NRC as an action item under TAC number 51796. Further licensing action will be required for this item.

3.7 Containment Purge Valves (II.E.4.2.6)

The licensee has stated in his response "The containment purge valves for HBR-2 are locked closed with their breakers racked out and cleared. Equipment that is cleared is verified to have the correct status every month by the Shift Foreman. The containment purge valves are continuously monitored for leakage via the Penetration Pressurization System (PPS). Indication for excessive valve leakage would be indicated in the control room via the PPS alarm. Sufficient administrative controls are in effect and enforceable, therefore, no additional guidance is necessary in the TSs."

Review of the TS for HBR-2 indicates that there is no requirement in the TS for having the containment purge valves locked closed except for

safety related activities and there is no surveillance requirement that the valves be verified closed at least every 31 days and subjected to leakage rate limits.

The requirements for NUREG-0737 Item II.E.4.2.6 are not met in the HBR-2 TS. Further licensing action will be required for this item.

3.8 Radiation Signal on Purge Valves (II.E.4.2.7)

The licensee has stated in his response, "Although the containment purge valves are locked closed with their breakers racked out, the respective radiation monitors and associated trips are functionally checked every two weeks. These radiation monitors are not in the TSs at the present time, but are incorporated in the Radiological Effluent Technical Specification (RETS) which will be submitted to the NRC in the near future." The licensee submitted the RETS to the NRC for review February 7, 1983 and it is presently being reviewed.

The requirements for NUREG-0737 Item II.E.4.2.7 have not been met in the HBR-2 TS. Further licensing action may be required for this item, following the NRC review.

3.9 Upgrade Babcock and Wilcox (B&W) AFWS (II.K.2.8)

H. B. Robinson Unit 2 is a Westinghouse design and, therefore, the requirements of this item are not applicable. No licensing action is required.

3.10 B&W Safety-Grade Anticipatory Reactor Trip (II.K.2.10)

H. B. Robinson Unit 2 is a Westinghouse design and, therefore, the requirements of this item are not applicable. The anticipatory trip is evaluated under NUREG-0737 Item II.K.3.3 for the Westinghouse design. No further licensing action is required.

3.11 B&W Thermal-Mechanical Report (II.K.2.13)

H. B. Robinson Unit 2 is a Westinghouse design and, therefore, the requirements of this item are not applicable. It should be noted that there is a TMI action item, Thermal-Mechanical Report, for HBR-2 under TAC 46901. No further licensing action is required by Generic Letter 82-16 for this item.

3.12 Reporting Safety and Relief Valve Failures and Challenges (II.K.3.3)

The licensee has stated in his response that the HBR-2 Emergency Response Plan requires that the failure of a pressurizer safety or relief valve to close be declared an unusual event, and unusual events are required by 10 CRF 50.72 to be reported within one hour via telcon to the NRR. The licensee also stated that their administrative instructions require challenges to pressurizer PORV's and safety valves be included in the HBR-2 Annual Operating Report. It is CP&L's position that incorporating the reporting requirements into the TS would be redundant and unnecessary.

Review of TS Section 6.9.2 on reportable occurrences, concludes that the section does not specifically require that safety and relief valve failures and challenges be reported. Reporting of these failures is dependent entirely on other procedures. Unless a recent TS change has been submitted by CP&L or an acceptance of their policy has been issued by the NRC, further licensing action is required.

3.13 Anticipatory Trip on Turbine Trip (II.K.3.12)

The licensee has stated in his response that, "In a letter dated June 27, 1980, CP&L informed the NRC that HBR-2 has an at-power reactor trip for a turbine trip. The surveillance requirements for the turbine trip are included the TSs. The allowable setpoints for the turbine trip signal for reactor trip are not incorporated in the HBR-2 TS, because these setpoints are not used in the transient and accident analysis."

Review of the licensee TS shows that the limiting operating conditions for turbine trip and surveillance testing are contained in Tables 3.5-2 and 4.1-1, respectively. However, since the turbine trip signal is not included in the protection instrumentation settings for reactor trip, the licensee has not met the requirements of Generic Letter 82-16, and, unless a recent TS change has been submitted by CP&L or an acceptance of their policy has been issued by the NRC, further licensing action is required for this item.

4. CONCLUSIONS

Based on our review, we find the licensee conforms to those issues addressed in Generic Letter 82-16 on TS, except for those identified as follows:

1. Section 3.1 STA Training--Until further guidance is provided by the Commission, no further licensing action can be taken to determine whether the exact training program for the STA is required to be in the TS.
2. Section 3.2 Shift Manning-Overtime Limits--The CP&L policy is contained in administrative procedures rather than in the TS and, as stated in their response, the CP&L policy deviates from the NRR criteria.
3. Section 3.4 Safety Grade AFW System Initiation and Flow Indication--The NRC is presently reviewing open items of the original Safety Evaluation pertaining to safety grade flow indication and initiation as a separate evaluation.
4. Section 3.6 Containment Pressure Setpoint--The licensee has submitted a TS change request to correct the containment pressure setpoint. This request is presently under review by the NRC.
5. Section 3.7 Containment Purge Valves--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item.
6. Section 3.8 Radiation Signal on Purge Valves--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item. A licensee submittal for this is presently under NRC review and licensing action may be required, following this review.

7. Section 3.12 Reporting Safety Valve and Relief Valve Failures and Challenges--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item.

8. Section 3.13 Anticipatory Trip on Turbine Trip--The TS for H. B. Robinson Unit 2 do not comply with Generic Letter 82-16 for this item.

5. REFERENCES

1. D. G. Eisenhut, NRC letter to All Pressurized Power Reactor Licensees, "NUREG-0737 Technical Specifications (Generic Letter 82-16)," September 20, 1982.
2. NUREG-0737 Clarification of TMI Action Plan Requirements published by the Division of Licensing, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, November 1980.
3. S. R. Zimmermann, Carolina Power & Light Co. letter to Darrell G. Eisenhut, Office of Nuclear Reactor Regulation, "H. B. Robinson Steam Electric Plant, Unit No. 2 Docket No. 50-261, License No. DPR-23, Response to Generic Letter No. 82-16, NUREG-0737 Technical Specifications," December 23, 1982.
4. D. G. Eisenhut, NRC letter to All Licensees of Operating Plants, Applicants for an Operating License, and Holders of Construction Permits, "Nuclear Power Plant Staff Working Hours (Generic Letter No. 82-12)," June 15, 1982.
5. H. B. Robinson Steam Electric Plant, Unit No. 2 Technical Specifications, Appendix "A" to License No. DPR-23, Amendment No. 74, January 6, 1983.
6. Steven A. Varga, NRC letter to J. A. Jones, CP&L Company, "NUREG-0737 Item I.A.1.1 Shift Technical Advisor (STA)," January 15, 1982.
7. Glode Requa, NRC letter to E. E. Utley, CP&L Company, "Amendment No. 74 to Facility Operating License No. DPR-23 for H. B. Robinson Steam Electric Plant, Unit No. 2," January 6, 1983.
8. Steven A. Varga, NRC letter to J. A. Jones, CP&L Company, "Containment Setpoint Pressure TMI Task Action Plan Item II.E.4.2 Position 5 of NUREG-0737," December 21, 1981.

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