



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

October 16, 1990

Docket No. 50-261

Mr. Lynn W. Eury  
Executive Vice President  
Power Supply  
Carolina Power & Light Company  
Post Office Box 1551  
Raleigh, North Carolina 27602

Dear Mr. Eury:

SUBJECT: ISSUANCE OF AMENDMENT NO. 130 TO FACILITY OPERATING LICENSE NO. DPR-23 REGARDING PLANT VENT RADIATION MONITORS AND WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATION (TS) 3.5.3.3, TABLE 3.5-7 - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2, (TAC NO. 77728)

On October 5, 1990, the Carolina Power & Light Company (CP&L) requested an emergency amendment and a temporary waiver of compliance with respect to H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) Technical Specifications (TS) 3.5.3.3, Table 3.5-7, Items 3.a and 3.b, Required Action b. The Temporary Waiver of Compliance was granted verbally on October 5, 1990, until processing of the emergency license amendment could be completed.

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 130 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.

The amendment adds a footnote to Technical Specification 3.5.3.3, Table 3.5-7, Items 3.a and 3.b, Required Action b which provides a one time change during Refueling Outage 13 to allow continued effluent releases (purging from the reactor containment vessel) with radiation monitors RMS-11 and RMS-12 and their associated backup monitors RMS-14 and RMS-34 out of service. The amendment allows containment purging only with no fuel in containment and containment integrity not required.

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*units*

Mr. Lynn W. Eury

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A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's next bi-weekly Federal Register notice.

Sincerely,

Original Signed By:

Ronnie H. Lo, Senior Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 130 to DPR-23
- 2. Safety Evaluation

cc w/enclosures:  
See next page

DISTRIBUTION  
See attached page

OFC	: LA: PD21 DRPR	: PM: PD21 DRPR	: PRP	: OGC	: D: PD21 DRPR
NAME	: Anderson	: RLo: sw	: LCunningham	: E Holler	: EAdensam
DATE	: 10/11/90	: 10/12/90	: 10/13/90	: 10/15/90	: 10/16/90

Mr. L. W. Eury  
Carolina Power & Light Company

H. B. Robinson Steam Electric  
Plant, Unit No. 2

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AMENDMENT NO. 130 TO FACILITY OPERATING LICENSE NO. DPR-23 - ROBINSON,  
UNIT NO. 2

**Docket File**

NRC PDR

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cc: Robinson Service List



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

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 130  
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Carolina Power & Light Company (the licensee), dated October 5, 1990, 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. 130, are hereby incorporated in the license. Carolina Power & Light Company 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

Original Signed By:

Elinor G. Adensam, Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 16, 1990

OFC	: LA: PD21: DRPR: PM: PD21: DRPR: PRPB	: OGC	: D: PD21: DRPR	:	:
NAME	: PAnderson	: RLo: sw	: C Cunningham	: E Holler	: E Adensam
DATE	: 10/11/90	: 10/12/90	: 10/12/90	: 10/15/90	: 10/16/90

TABLE 3.5-7 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

Release Pathway/Instrumentation	MCO*	Required Action
3. Containment Vessel Via Plant Vent (Continued)		b. Effluent releases via this pathway may continue provided that either of the Plant Vent Radionoble Gas Monitors (RMS-14 or RMS-34) is operable; otherwise, suspend all releases via this pathway.**
b. Radioparticulate Monitor (RMS-11) provides automatic termination of containment vessel releases exceeding alarm/trip setpoints	1	<p>With the number of channels operable less than the MCO requirement:</p> <p>a. Exert best efforts to return the instruments to operable status within 30 days and, if unsuccessful, explain in the next Semi-annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner in accordance with Specification 6.9.1.d and,</p> <p>b. Effluent releases via this pathway may continue provided that either of the Plant Vent Radionoble Gas Monitors (RMS-14 or RMS-34) is operable; otherwise, suspend all releases via this pathway.**</p>
c. Sampler flow rate monitor (RMS-11)	1	<p>With the number of channels operable less than the MCO requirement:</p> <p>a. Exert best efforts to return the instruments to operable status within 30 days and, if unsuccessful, explain in the next Semi-annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner in accordance with Specification 6.9.1.d and,</p> <p>b. Effluent releases via this pathway may continue provided that the flow rate is estimated once per 4 hours.</p>
4. Condenser Vacuum Pump Vent		
a. Radionoble gas monitor (RMS-15) diverts effluents from Condenser Vacuum Pump Vent to the Plant Vent upon exceeding alarm/trip setpoint.	1	<p>With the number of channels operable less than the MCO requirement:</p> <p>a. Exert best efforts to return the instruments to operable status within 30 days and, if unsuccessful, explain in the next Semi-annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner in accordance with Specification 6.9.1.d and,</p>

\*MCO - Minimum Channels Operable

\*\* For one time only during Refueling Outage 13 with no fuel in the containment and containment integrity not required, effluent releases via this pathway may continue with RMS-14 and RMS-34 inoperable, provided that grab samples of the containment vessel atmosphere are taken once per 12 hours and analyzed for radionoble gases within 24 hours.

3.5-27

Amendment No. 85, 103, 130



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 130 TO FACILITY OPERATING LICENSE NO. DPR-23

CAROLINA POWER & LIGHT COMPANY

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

DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated October 5, 1990, the Carolina Power & Light Company submitted a request for an emergency amendment to the H. B. Robinson Steam Electric Plant, Unit No. 2, Technical Specifications (TS). In addition, the licensee requested a temporary waiver of compliance until the amendment became effective. The amendment adds a footnote to Technical Specification 3.5.3.3, Table 3.5-7, Items 3.a and 3.b, Required Action b, which provides a one time change during Refueling Outage 13 to allow continued effluent releases (purging from the reactor containment vessel) with radiation monitors RMS-11 and RMS-12 and their associated backup monitors, RMS-14 and RMS-34, out of service. The amendment allows containment purging only with no fuel in containment and containment integrity not required.

Essentially, the October 5, 1990, letter requested that when radiation monitors RMS-11, RMS-12, RMS-14, and RMS-34 are out of service while upgrading the radiation monitoring system (RMS), and while containment integrity is not required, effluent releases via this pathway may continue, provided that grab samples of containment vessel atmosphere are taken once per 12 hours and analyzed within 24 hours. If the results of any of these sample analyses exceed limits currently specified in effluent TS limits for the facility, the licensee has indicated the release will be terminated and appropriate actions taken to remedy the situation before resuming releases via this pathway.

In addition, the licensee has indicated that routine monitoring of areas inside containment will be performed for the (approximately) five week period during which these modifications will be effected.

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## 2.0 EVALUATION

Under the conditions proposed by the licensee for implementation of the modifications to the gaseous effluent monitoring system, the potential for significant effluent releases is minimized since all reactor fuel is out of the containment building and will not be returned until the necessary monitors are operable. Thus, during the period that this amendment is effective, it is appropriate that the grab samples be taken once every 12 hours and analyzed within 24 hours. This compensatory action is identical to that required in TS Table 3.5-7 pertaining to the current plant vent radionoble gas monitor RMS 14. Other release paths, such as the fuel handling building and auxiliary building effluent, will continue to be monitored and or sampled in accordance with the existing TS requirements. With no fuel in the containment vessel, the sources of radionuclides in the containment vessel available for release are comparable to, or less than, those available for release from the auxiliary building. Further, the licensee has agreed to take appropriate actions to identify and to correct the source of any indications of high activity obtained from sample analysis. In addition, the effluents released via this pathway (i.e., the plant vent) pass through a HEPA and charcoal filter, thus minimizing the significance of any releases of iodine or particulate radionuclides that might occur.

## 3.0 SUMMARY

Based on the foregoing, the staff finds that because of the low potential for any significant releases and the fact that periodic samples are collected and analyzed by the licensee, the changes proposed by the licensee in its October 5, 1990, application are acceptable.

## 4.0 STATEMENT OF EMERGENCY CIRCUMSTANCES

Emergency handling in accordance with 10 CFR 50.91 is necessary in order to avoid an unnecessary outage extension which would result in delay in resumption of power operation or an increase in overall personnel radiation exposure. The outage extension would result from the licensee's inability to proceed with the simultaneous removal from service of plant monitors RMS-11, 12, 14, and 34, in support of the RMS upgrade project, without a significant increase in personnel radiation exposure. This potential delay cannot be avoided since alternate approaches would require a major revision to the modification, requiring that the monitors be taken out of service sequentially so that all four would not be inoperable at the same time. This would result in a significant increase in both complexity and elapsed time, since work would be occurring around live monitors in sequence versus simultaneous work on a completely de-energized system. The overall impact could be an extension of up to two weeks in the outage duration. If the licensee were to proceed as scheduled with the work in parallel, without this TS action, they would be required to isolate containment purging, resulting in increased personnel radiation exposure.

The NRC Staff finds that the licensee, notwithstanding reasonable planning for the outage, did not discover the circumstances causing this emergency situation until scheduling of outage work began and that the licensee acted promptly to evaluate alternate approaches after the circumstances were discovered.

#### 5.0 FINAL DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operability of the facility in accordance with the proposed changes would not:

1. involve a significant increase in the probability or consequences of any accident previously evaluated, or
2. create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. involve a significant reduction in a margin of safety.

The licensee evaluated the request in light of these three criteria and has determined:

1. Operation of the facility, in accordance with the proposed amendment and waiver, would not involve a significant increase in the probability or consequences of an accident previously analyzed because for the duration of the use of this specification the reactor core is offloaded to the spent fuel pool. With the fuel offloaded, no accident previously evaluated impacting the reactor can occur.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated because with no fuel in the core and no changes to the facility occurring due to the Technical Specifications change no new kind of accident can occur.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety because with no fuel in the reactor, no source term in the containment for radionoble gases, all purges going through particulate and carbon filters, and vent stack monitoring in accordance with the Technical Specifications being performed, no significant reduction in margin of safety can occur.

The staff has evaluated the licensee's submittal and agrees that it satisfies the standards of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment involves no significant hazards consideration.

#### 6.0 STATE CONSULTATION

The appropriate representative of the State of South Carolina was notified of this amendment. The State of South Carolina has no comments.

#### 7.0 ENVIRONMENTAL CONSIDERATION

This amendment changes requirements with respect to 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 off site; and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final no significant hazards consideration finding with respect to this amendment. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 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.

#### 8.0 CONCLUSION

The staff has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) 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: October 16, 1990

Principal Contributor: K. Eccleston