

June 21, 1990

Docket No. 50-261

DISTRIBUTION
See attached page

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. 127 TO FACILITY OPERATING LICENSE NO.
DPR-23 - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2,
REGARDING NUCLEAR SOURCE RANGE INSTRUMENTATION TESTING
(TAC NO. 76854)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR-2). This amendment consists of changes to the Technical Specifications (TS) in response to your request dated May 25, 1990, which you requested be processed as an exigent amendment.

The amendment adds a clarifying note regarding frequency of the nuclear source range instrumentation "Logic Channel Testing" in Table 4.1-1 of the TS. The amendment also corrects a typographical error and rennumbers a subsequent note in Table 4.1-1.

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

Sincerely,

/s/
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. 127 to DPR-23
2. Safety Evaluation

cc w/enclosures:

See next page

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ROBINSON EXIGENCY AMENDMENT

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(B) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 127, 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

15
Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 21, 1990

OFC	:LA:PD21:DRPR:PM:PD21:DRPR:	OGC	:D:PD21:DRPR:	MAJ:DRPR:	:
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ROBINSON EXIGENCY AMENDMENT

AMENDMENT NO. 127 TO FACILITY OPERATING LICENSE NO. DPR-23 - ROBINSON,
UNIT NO. 2

Docket File ←

NRC PDR

Local PDR

PDII-1 Reading

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J. Stewart 7-E-12

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cc: Robinson Service List



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

June 21, 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. 127 TO FACILITY OPERATING LICENSE NO.
DPR-23 - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2,
REGARDING NUCLEAR SOURCE RANGE INSTRUMENTATION TESTING
(TAC NO. 76854)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR-2). This amendment consists of changes to the Technical Specifications (TS) in response to your request dated May 25, 1990, which you requested be processed as an exigent amendment.

The amendment adds a clarifying note regarding frequency of the nuclear source range instrumentation "Logic Channel Testing" in Table 4.1-1 of the TS. The amendment also corrects a typographical error and renumbers a subsequent note in Table 4.1-1.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Lo", is positioned above the typed name of the signatory.

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. 127 to DPR-23
2. Safety Evaluation

cc w/enclosures:
See next page

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

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

cc:

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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. 127
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 May 25, 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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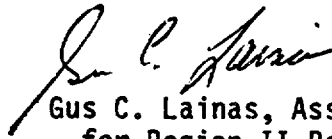
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(B) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 127, 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



Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 21, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 127

FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove Pages

4.1.-7

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Insert Pages

4.1-7

4.1-7a

TABLE 4.1-1 (Continued)

<u>Channel Description</u>	<u>Check</u>	<u>Calibrate</u>	<u>Test</u>	<u>Remarks</u>
21. Containment Sump Level	N.A.	R	N.A.	
22. Turbine Trip Logic**	N.A.	N.A.	R	
23. Accumulator Level and Pressure	S	R	N.A.	
24. Steam Generator Pressure	S	R	M	
25. Turbine First Stage Pressure	S	R	M	
26. DELETED				
27. Logic Channel Testing	N.A.	N.A.	M(1) S/U(2)	(1) During hot shutdown and power operations. When periods of reactor cold shutdown and refueling extend this interval beyond one month, this test shall be performed prior to startup. (2) Logic channel testing for nuclear source range channels shall only be required prior to each reactor startup, if not performed within the previous seven (7) days.
28. Turbine Overspeed Protection Trip Channel (Electrical)	N.A.	R	M	
29. 4 Kv Frequency	N.A.	R	R	

** Stop valve closure or low EH fluid pressure.

TABLE 4.1-1 (Continued)

<u>Channel Description</u>	<u>Check</u>	<u>Calibrate</u>	<u>Test</u>	<u>Remarks</u>
30. Reactor Trip Breakers	N.A.	N.A.	M(1)	(1) The reactor trip breaker trip actuating device operational test shall verify the operability of the UV trip attachment and the shunt trip attachment, individually.
31. Overpressure Protection System	N.A.	R	M	



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 127 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 May 25, 1990, the Carolina Power & Light Company submitted a request for changes to the H. B. Robinson Steam Electric Plant, Unit No. 2, (HBR-2) Technical Specifications (TS) to clarify that testing of the source range channel shall only be required prior to startup if not performed within the previous seven days.

The proposed amendment would change Table 4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels," by adding a note to Item 27, "Logic Channel Testing." The note applies to the testing frequency of the nuclear source range instrumentation so it will be consistent with Item 3, "Nuclear Source Range". The proposed amendment will also correct a typographical error and renumber a subsequent note on Table 4.1-1.

2.0 DISCUSSION AND EVALUATION

This amendment is required because Item 27 of Table 4.1-1 of the TS requires monthly testing of the trip logic but does not currently provide for an exception for the source range channel. The licensee states that the source range logic has not been tested at power since the plant was licensed. A review of the TS and the plant specific hardware configuration indicates that testing of the source range high flux trip is appropriate only prior to reactor startup. The plant equipment is such that testing of the source range trip logic while at power would result in damaging voltages to the source range detectors. To test at power would require the use of temporary jumpers to isolate the high voltage from the source range detectors. The use of jumpers is, in general, contrary to accepted practice. Item 3, "Nuclear Source Range," of Table 4.1-1 is specific in that the instrument channel testing is required only for startup and not on a monthly basis. Additionally, Table 3.5-2 states that when the intermediate range indicates a value greater than $1E-10$ amps the source range minimum operable channel requirements do not apply.

The source range reactor trips are not included in the FSAR Chapter 15 transient and accident analysis but, as stated in Chapter 15, are used to provide protection during reactor startup only. It should also be noted that H. B. Robinson has separate source range instrumentation (in accordance with Regulatory Guide 1.97), which provides diverse source range information. The limitation of this test to times prior to start-up of the reactor would not lessen safety and is acceptable to the staff.

The licensee submittal included an additional change to correct an apparent typographical error for Item 27 and Item 30 of Table 4.1-1. The staff agrees that the proposed changes are typographical in nature and are acceptable.

Based on the present equipment configurations and specific source range testing requirements addressed elsewhere in the TS, the proposed source range surveillance test interval (i.e., prior to each reactor startup if not performed within the last seven days) is acceptable to the staff. The proposed changes as referenced in the licensee's May 25 submittal are consistent with the source range testing requirements previously reviewed by the the staff, and are acceptable.

3.0 NEED FOR EXPEDITED ACTION

On March 23, 1990, the licensee identified an inconsistency in the TS with respect to surveillance testing of the source range trip logic. The TS, as currently written, requires testing of the nuclear source range channels monthly, rather than prior to reactor startup if the test was not performed within the previous seven days. As stated in section 2.0, safe testing of the source range trip logic would require that the reactor be shutdown. Subsequent to the licensing event report (LER) submitted on April 2, 1990, a conference call was held between NRC staff and the licensee on May 16, 1990, during which the licensee decided to request an amendment to clarify the TS on this issue.

The source range logic surveillance test was last performed during a plant shutdown on May 19, 1990. According to the present TS, the next test should be performed by June 18, 1990. However, even with the allowed TS tolerance on surveillance interval periods, the next test is required by June 25, 1990. Therefore, exigent handling of the license amendment is needed to avoid shutting the facility down to test the nuclear source range instrument logic solely to meet the TS surveillance requirement.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards

consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (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 has reviewed this request and determined:

1. Operation of the facility, in accordance with the proposed amendment, would not involve a significant increase in the probability or consequences of an accident previously analyzed because previously evaluated accidents, as found in Chapter 15 of the UFSAR, do not discuss nor take credit for the source trip feature. Also, the proposed amendment does not introduce any new evolution or test, and cannot increase the probability or consequences of occurrence of any accident previously evaluated.
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. The proposed amendment is administrative and does not create any new tests, evolutions, or requirements. The amendment clarifies existing logic channel testing requirements and provides consistency with existing requirements for testing of nuclear source range channels. The source range instrument is deenergized during power operations, and no credit for the source range trip feature is taken in the UFSAR accident analysis. Therefore, this amendment will not create the possibility of a new kind of accident from any accident previously evaluated. The affected components will be available and will be verified operable prior to being required for service, consistent with the intent of the Technical Specification prior to the proposed amendment. Therefore, this amendment does not create the possibility of a different kind of accident from any accident previously evaluated.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety. The source range channel testing requirements will be made consistent by this amendment. These channels, including the logic channel portions, will be tested and verified operable prior to being required for service. The proposed amendment is administrative in nature and does not involve a safety-significant change to the Technical Specifications. Therefore, this amendment will not affect the margin of safety.

Based on the review of the licensee's submittal, the staff has made a final determination that the licensee's amendment request does not involve a significant hazards consideration since operation of HBR-2 with the requested change would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (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.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in a requirement in respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR part 20 and changes to the surveillance requirements. 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 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 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.

6.0 CONCLUSION

The Commission made a proposed determination that this amendment involves no significant hazards consideration, which was published in the FEDERAL REGISTER (55 FR 22975) on June 5, 1990, and consulted with the State of South Carolina. No public comments or requests for hearing were received, and the State of South Carolina did not have any comments.

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.

Principal Contributor: James Stewart

Dated: June 21, 1990