

July 8, 1996

Mr. C. S. Hinnant, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: ISSUANCE OF AMENDMENT NO. 170 TO FACILITY OPERATING LICENSE NO.
DPR-23 REGARDING MISSED SURVEILLANCES - H. B. ROBINSON STEAM
ELECTRIC PLANT, UNIT NO. 2 (TAC NO. M95147)

Dear Mr. Hinnant:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 170 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR). This amendment changes the HBR Technical Specifications (TS) in response to your request dated March 29, 1996.

The amendment revises the technical specifications (TS) to add an allowance to complete a TS-required surveillance within 24 hours of discovery of a missed surveillance in accordance with the guidance of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." The wording specifying intervals for testing has been changed to reflect wording consistent with the new STS. Typographical errors in the Bases are also being corrected.

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,
Original signed by:

Brenda L. Mozafari, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

1. Amendment No. 170 to DPR-23
2. Safety Evaluation

cc w/enclosures:

See next page

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OFFICE	LA:PDII-1	PM:PDII-1	OGC <i>GBS</i>	D:PDII-1	<i>GBS</i> 96-067
NAME	Dunnington <i>ED</i>	BMOzafari <i>BLN</i>	<i>R. Bachmann</i>	EImbro <i>FE</i>	<i>C. J. Gimes</i>
DATE	6/14/96	6/17/96	7/2/96	7/3/96	6/27/96
COPY	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes/No	Yes/ <input checked="" type="checkbox"/> No	Yes/No

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AMENDMENT NO. 170 TO FACILITY OPERATING LICENSE NO. DPR-23 - H. B. ROBINSON
STEAM ELECTRIC PLANT, UNIT NO. 2

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 170
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 March 29, 1996, 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:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 170 , 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 and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Eugene V. Imbro, 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: July 8, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 170

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.

<u>Remove Pages</u>	<u>Insert Pages</u>
4.1-1	4.1-1
4.1-1a	4.1-1a
-	4.1-1b
4.5-2	4.5-2
4.8-1	4.8-1
4.16-1	4.16-1

4.0 SURVEILLANCE REQUIREMENTS

Specified intervals may be adjusted plus or minus 25% to accommodate normal test schedules. Performance of any surveillance test outlined in these specifications is not required when the system or component is out of service as permitted by the Limiting Conditions for Operation. Prior to returning the system to service, the specified calibration and testing surveillance shall be performed.

If it is discovered that a Surveillance Requirement, as defined by Specification 4.0 and 4.0.1(e.), was not performed within its specified frequency, then compliance with the requirement to declare that the Technical Specifications requirements are not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, then the Technical Specifications requirements must immediately be declared not met, and the applicable action requirements must be undertaken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Technical Specifications requirements must be immediately declared not met and the applicable action requirements must be undertaken.

4.0.1 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50. Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel
Code and applicable Addenda
terminology for inservice
inspection and testing activities

Required frequencies for
performing inservice
inspection and testing
activities

Weekly
Monthly
Quarterly or every 3 months
Semiannually or every 6 months
Every 9 months
Yearly or annually

At least once per 7 days
At least once per 31 days
At least once per 92 days
At least once per 184 days
At least once per 276 days
At least once per 366 days

- c. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

- d. Nothing in the A E Boiler and Pressure Vessel C shall be construed to supersede the requirements of any Technical Specification.
- e. The provisions of Specification 4.0 are applicable to the above required frequencies for performing inservice inspection and testing activities.

Basis

The provisions of this specification establish the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. The limitation of Specification 4.0 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

The provisions of Specifications 4.0 and 4.0.1e. are not intended to be used repeatedly merely as an operational convenience to extend surveillance intervals or periodic completion time intervals beyond those specified.

Specification 4.0 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specifications 4.0 and 4.0.1e., and not at the time that the specified frequency was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

The basis for the delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0 allows the full delay period of 24 hours to perform the surveillance.

Failure to comply with specified frequencies for surveillances is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the surveillance within the delay period allowed by this specification, or within the completion time of the actions, restores compliance with respect to operability of the component or system.

Containment Spray System

- 4.5.1.3 System tests shall be performed at each refueling interval. The test shall be performed with the isolation valves in the spray supply lines at the containment and spray additive tank blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.
- 4.5.1.4 Verify each spray nozzle is unobstructed at least every 10 years.
- 4.5.1.5 The tests discussed in 4.5.1.3 and 4.5.1.4 will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

Containment Fan Coolers

- 4.5.1.6 Each fan cooler unit shall be tested at monthly intervals to verify proper operation of all essential features including valves, dampers and piping.

4.5.2 Component Verification

- 4.5.2.1 When the reactor coolant pressure is in excess of 1,000 psi, it shall be verified at least once per 12 hours (from the RTGB indicators/controls) that the following valves are in their proper position with control power to the valve operators removed.

<u>Valve Number</u>	<u>Valve Position</u>
1- MOV 862 A&B	Open
2- MOV 863 A&B	Closed
3- MOV 864 A&B	Open
4- MOV 866 A&B	Closed

4.8 AUXILIARY FEEDWATER SYSTEM

Applicability

Applies to periodic testing requirements of the turbine-driven and motor-driven auxiliary feedwater pumps.

Objective

To verify the operability of the auxiliary feedwater system and its ability to respond properly when required.

Specification

- 4.8.1 Each motor driven auxiliary feedwater pump will be started at monthly intervals, run for 15 minutes, and determined that it is operable.
- 4.8.2 The steam turbine driven auxiliary feedwater pump by using motor operated steam admission valves will be started at monthly intervals, run for 15 minutes, and determined that it is operable when the reactor coolant system is above the cold shutdown condition. When periods of reactor cold shutdown extend this interval beyond one month, the test shall be performed within 24 hours of achieving stable plant conditions at ≥ 1000 psig in the steam generator following plant heatup.
- 4.8.3 The auxiliary feedwater pumps discharge valves will be tested by operator action at monthly intervals.
- 4.8.4 These tests shall be considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly.

4.16 RADIOACTIVE SOURCE LEAKAGE TESTING

Applicability:

Applies to by-product, source and special nuclear radioactive material used at H. B. Robinson Unit 2.

Objective:

The objective of this specification is to assure that leakage from by-product, source, and special nuclear radioactive material sources does not exceed allowable limits.

Specification:

- 4.16.1 The leakage test shall be capable of detecting the presence of .005 microcurie of radioactive material on the test sample. If the test reveals the presence of .005 microcurie or more of removable contamination, it shall immediately be withdrawn from use, decontaminated, and repaired, or be disposed of in accordance with Commission regulations. Sealed sources are exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.
- 4.16.2 Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the Commission or an agreement State as follows:
- A. Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at semi-annual intervals.
 - B. The periodic leak test required does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another user unless they have been leak tested within six months prior to the date of use or transfer.

In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, sealed sources shall not be put into use until tested.
 - C. Startup sources shall be leak tested prior to and following any repair or maintenance and before being subjected to core flux.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 170 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 March 29, 1996, the Carolina Power & Light Company (licensee) submitted a request for changes to the H. B. Robinson Steam Electric Plant, Unit No. 2, Technical Specifications (TS). The requested changes would allow a period of 24 hours to complete a surveillance requirement upon the discovery that the surveillance has been missed. The request states that these changes are needed to avoid unnecessary shutdowns caused by inadvertently exceeding a surveillance interval. Pertinent Bases are also revised to clarify the criteria for incorporating portions of NUREG-1431, Revision 1, "Standard Technical Specifications - Westinghouse Plants," April 1995, (improved STS) into the licensee's plant TS.

2.0 EVALUATION

In Generic Letter (GL) 87-09 the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components in fact are operable. Because the allowable outage time limits of some Action requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance. The time limit should be based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance.

After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action requirements are less than this time limit or when shutdown Action requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action requirements before the surveillance can be completed.

The failure to perform a surveillance requirement will continue to constitute noncompliance with the operability requirements. Thus, a failure to meet a surveillance requirement due to a failure to schedule a surveillance will result in entering the applicable action requirement for the affected equipment.

Based on the above, the following addition to TS 4.0 is acceptable:

If it is discovered that a Surveillance Requirement, as defined by Specification 4.0 and 4.0.1(e), was not performed within its specified frequency, then compliance with the requirement to declare that the Technical Specifications requirements are not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, then the Technical Specifications requirements must immediately be declared not met, and the applicable action requirements must be undertaken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Technical Specifications requirements must be immediately declared not met and the applicable action requirements must be undertaken.

The Bases change to support the TS change is also appropriate.

A new TS Section 4.0.1(e) will be added to clarify that TS Section 4.0 is applicable to inservice inspection surveillance test intervals. The proposed change is consistent with the guidance of the GL and the improved STS, and, thus, is acceptable.

Additional changes proposed for TS Sections 4.5.1.6, 4.8.1, 4.8.2, 4.8.3, and 4.16.2.A replace the wording "not to exceed" and "not greater than" with words consistent with the improved STS and GL guidance on interval descriptions. The wording changes also describe the surveillance intervals (e.g., monthly and semi-annual intervals) in a manner consistent with other TS Section 4 surveillances. Therefore, the proposed changes are acceptable because they are consistent with NRC guidance.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of South Carolina official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes the Surveillance Requirements. The NRC 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (61 FR 25699). Accordingly, the 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 the amendment.

5.0 CONCLUSION

The Commission 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 the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Mozafari

Date: July 8, 1996