

June 26, 2002

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

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 (HBRSEP2) -
REQUEST FOR ADDITIONAL INFORMATION (RAI) ON AMENDMENT REQUEST
REGARDING TECHNICAL SPECIFICATION (TS) CHANGES TO MODIFY
CONTAINMENT VESSEL SPRAY NOZZLE TESTING FREQUENCY SPECIFIED
IN TS SURVEILLANCE REQUIREMENT 3.6.6.8 (TAC NO. MB4248)

Dear Mr. Moyer:

By letter dated February 21, 2002, you submitted a request regarding TS changes to modify the containment vessel spray nozzle testing frequency specified in TS surveillance requirement 3.6.6.8 for the HBRSEP2. The NRC staff reviewed the information that you provided in the subject amendment request, but needs additional information to complete the review.

This request for information was discussed with Mr. Chuck Baucom of your staff on June 21, 2002, and a mutually agreeable schedule of within 30 days of receipt of this RAI was established for your response. The RAI is enclosed.

If you have any questions regarding this request, please contact me at (301) 415-1478.

Sincerely,

/RA/

Ram Subbaratnam, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: RAI

cc w/encl: See next page

Mr. J. W. Moyer, Vice President
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H. B. Robinson Steam Electric Plant,
Unit No. 2
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REQUEST FOR ADDITIONAL INFORMATION

AMENDMENT REQUEST REGARDING TECHNICAL SPECIFICATION (TS) CHANGES TO

MODIFY CONTAINMENT VESSEL SPRAY NOZZLE TESTING FREQUENCY

FOR

CAROLINA POWER & LIGHT COMPANY (CP&L)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 (HBRSEP2)

DOCKET NO. 50-261

1. Experience at D. C. Cook Unit 1 (Licensee Event Report (LER) 98-027-02) seems to indicate that boric acid plate-out with the potential to block flow through the containment spray headers and nozzles can occur following an inadvertent spray actuation.
 - (a) Please indicate if HBRSEP2 ever had an inadvertent actuation of containment spray.
 - (b) If HBRSEP2 ever had an inadvertent actuation, please indicate what type of inspection of the spray system piping and nozzles was done and what other steps were taken to ensure that no boric acid build-up occurred.
 - (c) If not, please discuss what type of inspection would be done following an inadvertent spray actuation and why this method is sufficient to detect blockage due to boric acid plate-out.
2. Experience at D. C. Cook Units 1 and 2 (LER 98-027-02) seems to indicate that the typical test for blockage in the containment spray lines and nozzles may not be effective in detecting debris in the spray lines, at least the amount reported in this LER.

Please indicate whether your testing records show any evidence that the TS containment spray flow blockage test may have a sensitivity to debris in the lines or nozzles that is too low; that is, debris is present but not detected by this test. For example, please indicate whether construction debris or other debris have been found in the containment spray system as a result of later inspections, tests, or repair work other than the containment spray system blockage test required by your TS.

3. Describe any previous maintenance activities on the containment spray system that had the potential to introduce debris. Please indicate if there is assurance that any such debris presently does not exist (including debris from construction).

4. Please describe how:

- (a) The plant's foreign material exclusion program would prevent debris from remaining in the containment spray system piping, headers, and nozzles following maintenance, testing, or inspections that result in opening the system.
- (b) Please discuss why the foreign material exclusion program is sufficient, following any maintenance, testing, or inspections that result in opening the system, to ensure that nothing remains in the system sufficient to block the system and cause a decrease in spray flow. Please discuss why a blockage test should not be run to provide defense-in-depth that the containment spray system is still capable of performing its safety function after the system is opened.
- (c) Following maintenance on a component of the containment spray system, please indicate what specific criteria are used to determine whether a flow blockage test of the containment spray system is required, who makes the decision and at what level of management is this decision approved.

Mr. J. W. Moyer
No. 2 Carolina Power & Light Company

H. B. Robinson Steam Electric Plant, Unit

cc:

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