



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 67 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. OPERABLE

Introduction

By letter dated April 10, 1980 the staff provided clarification to licensees regarding the usage of the terms "OPERABLE" and "OPERABILITY." Licensees were requested to revise their Technical Specifications to assure correct application of these terms in the operation of their plants. In their response of May 9, 1980, as supplemented by letter dated January 8, 1982, Carolina Power and Light Company (the licensee) proposed to revise the definition of these terms to include the key factors in the staff's clarification. After additional discussions on this subject, the licensee proposed to further revise the Robinson Unit No. 2 Technical Specifications to provide an additional, general, action statement to complement those currently required to meet the existing limiting Conditions of Operation.

Background

The NRC's Standard Technical Specifications (STS) were formulated to preserve the single failure criterion for systems that are relied upon in the safety analysis report. By and large, the single failure criterion is preserved by specifying Limiting Conditions for Operation (LCOs) that require all redundant components of safety related systems to be OPERABLE. When the required redundancy is not maintained, either due to equipment failure or maintenance outage, action is required, within a specified time, to change the operating mode of the plant to place it in a safe condition. The specified time to take action, usually called the equipment out-of-service time, is a temporary relaxation of the single failure criterion, which, consistent with overall system reliability considerations, provides a limited time to fix equipment or otherwise make it OPERABLE. If equipment can be returned to OPERABLE status within the specified time, plant shutdown is not required.

LCOs are specified for each safety related system in the plant, and with few exceptions, the ACTION statements address single outages of components, trains or subsystems. For any particular system, the LCO does not address multiple outages of redundant components, nor does it address the effects of outages of any support systems - such as electrical power or cooling water - that are relied upon to maintain the OPERABILITY of the particular system. This is because of the large number of combinations of these types of outages that are possible. Instead, the STS employ general specifications and an explicit definition of the term OPERABLE to encompass all such cases. These provisions have been formulated to assure that no set of equipment outages would be allowed to persist that would result in the facility being in an unprotected condition.

Because of the importance of assuring safety system availability, the staff has concluded that all facility technical specifications should contain these requirements, and that appropriate procedures should be implemented to assure that the necessary records, such as plant logs or similar documents, are reviewed to determine compliance with these specifications (1) promptly upon discovering a component, train, or subsystem to be inoperable, and (2) prior to removing a component from service.

Evaluation

In the past, when an LCO could not be met at Robinson-2, the licensee met the requirements of §50.36(c)(2) in Part 10 of the Code of Federal Regulations by "proceeding to HOT SHUTDOWN and, subsequently, COLD SHUTDOWN utilizing normal operating procedures." This procedure allowed the final step to be taken over a 24-hour period, although the actual time could be as short as 2 to 3 hours. The licensee's commitment to shorten this step to eight hours provides the additional protection sought by the staff when redundant ECCS systems become inoperable - using the clarified interpretation of "OPERABLE." The licensee does not consider it necessary to reference the new ACTION in each specific technical specification related to ECCS components because the new ACTION statement will only be a modification of "normal operating procedures."

The staff finds the licensee's actions to be acceptable.

II. ADMINISTRATIVE PROCEDURES

This amendment also revises Section 6.8.1 of the Robinson-2 Technical Specifications to reflect the licensee's commitment in their May 9, 1980 letter to develop procedures and administrative policies to meet the requirements of later revisions of ANSI N18.7 (1976) and Regulatory Guide 1.33 (Revision 2). This action had been requested by Region II of the Office of Inspection and Enforcement so that the licensee's use of these updated standards in other commitments would be consistent.

Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) 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.

Date: March 18, 1982