



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 83 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

Introduction

By letters dated October 24 as clarified by letters dated December 12, 1983, and March 28, 1984, Carolina Power and Light Company (the licensee) submitted a request for a license amendment concerning Technical Specification surveillance requirements. The December 12, 1983 submittal reinstated two sections of the Technical Specification that were deleted by error by the original submittal; Section 4.5.2.1 (originally 2.5.2.7) and 4.5.2.2 (originally 4.5.2.8). The March 28, 1984 submittal corrected a typographical error and corrected an error in Section 4.2.1.1.4 Bases to conform with ASME Section XI. The purpose of the original (October 24, 1983) submittal was to make the Technical Specification conform to the ASME Section XI. Therefore, the additional submittals did change the intent of the original submittal.

The licensee's proposed changes include:

1. Changes to delete detailed inservice inspection requirement from the current Technical Specifications and replace these with the requirements of Section XI of the ASME Boiler and Pressure Vessel Code in accordance with 10 CFR 50.55a. This will maintain consistency and conformance with the Code.
2. Miscellaneous additional changes of administrative nature to make the Technical Specifications consistent with other sections, the FSAR or to correct errors.

Evaluation

ASME XI Surveillance Requirements

Section XI of the ASME Boiler and Pressure Vessel Code is referenced in 10 CFR 50.55a as the document that should govern examination and testing of code classed systems. The incorporation of the Section XI into the H. B. Robinson Technical Specifications would remove any inconsistency between the current H. B. Robinson No. 2 examination and testing programs and the ASME Section XI requirements. This would ensure that appropriate requirements are applied.

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The staff has reviewed these changes and finds that:

The changes ensure that inservice examination and testing of safety related piping and components will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a.

This change includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice examination and testing activities.

Therefore, the staff finds these changes acceptable.

#### Turbine Trip Set Point

The Turbine Trip Set Point, listed as Item 22 in Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, was defined as a stop valve closure or low EH fluid pressure. The table has been revised to clarify the set point as being a stop valve closure or low auto-stop oil pressure.

This is a clarification in nomenclature and therefore acceptable.

#### Emergency Plant Portable Survey Instruments

Emergency Plant Portable Survey Instruments, listed as Item 26 in Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, has been deleted. This requirement is not governed by an LCO nor is it a protection instrument channel as defined in TS 1.4. The requirement for maintaining emergency monitoring equipment is defined in Section 6.3.1 of the Emergency Plan and plant procedure RST-003, "Emergency Kit Inventory."

Since the requirement for maintaining emergency monitoring equipment is defined in the Emergency Plan and plant procedure, and since it is not governed by an LCO, we find the change will remove redundancy while maintaining the requirement and therefore find the change acceptable.

#### Steam Flow/Feedwater Flow Mismatch

This change provides an additional limitation not currently included in the TS but are discussed in Section 7.2.1.1.1 of the FSAR, i.e., steam flow/feedwater flow mismatch in coincidence with low steam generator water level. This requirement was added to Tables 3.5-2 and 4.1-1 as items 16, 17, 39, and 40 contained on pages 3.5-9 and 4.1-6a. This is an additional limitation not previously included in the technical specifications.

This requirement is contained in Section 3 of the Standard Technical Specifications NUREG-0452, therefore, the addition is acceptable.

#### Test Frequency for Startup

The licensee's request, which resulted in Amendment 65, inadvertently removed a phrase "if not performed in the previous seven (7) days" from the surveillance frequency notation of Table 4.1-1.

This change reinstated an inadvertently removed phrase and therefore is acceptable.

#### Control Room Filters

The laboratory testing criteria stated in Item 14 of Table 4.1-3, Frequencies for Equipment Tests, conflicts with that in Section 4.15.1.d for the charcoal in the Control Room's heating, ventilation, and exhaust system (HVE-19). When the Technical Specifications were changed (Amendment No. 45) to reflect an upgrade in HVE-19's testing requirements due to the uprating of the unit's power level, two new sections were added to the Technical Specifications. These sections, 3.15 and 4.15, stated that the charcoal would be subjected to a methyl iodide removal test (90% efficient) in accordance with the ANSI/ASME N509-1976 standard. This was approved by the staff in a Safety Evaluation dated December 5, 1979. The testing requirements for HVE-19 is therefore being removed from Table 4.1-3 since it is now discussed in detail in Section 4.15. This change removes conflicting requirements and therefore is approved.

#### Environmental Consideration

This amendment involves a change in the 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 offsite, and that there is no significant increase in individual or cumulative occupation 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 Sec 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.

#### Conclusion

We have 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, and (2) 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.

Dated: September 10, 1984

Principal Contributors:

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