

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

## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 94 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 AND BACKGROUND

In November 1980, the staff issued NUREG-0737, "Clarification of TMI Action Plan Requirements," which included all TMI Action Plan items approved by the Commission for implementation at nuclear power plants. NUREG-0737 identifies those items for which Technical Specifications are required. A number of items which require Technical Specifications (TSs) were scheduled for implementation after December 31, 1981. The staff provided guidance on the scope of Technical Specifications for all of these items in Generic Letter 83-37. Generic Letter 83-37 was issued to all Pressurized Water Reactor (PWR) licensees on November 1, 1983. In this Generic Letter, the staff requested licensees to:

- review their facility's Technical Specifications to determine if they were consistent with the guidance provided in the Generic Letter, and
- 2. submit an application for a license amendment where deviations or absence of Technical Specifications were found.

By letter dated February 7, 1984, Carolina Power and Light Company (the licensee) responded to Generic Letter 83-37 by submitting Technical Specification change request for Robinson Unit 2. The licensee supplemented their initial response by letters dated July 20, 1984, and January 31, 1985. The licensee superseded all previous submittals by letter dated May 2, 1985. This evaluation covers the following TMI Action Plan items:

- 1. Reactor Coolant System Vents (II.B.1)
- 2. Post-Accident Sampling (II.B.3)

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- 3. Noble Gas Effluent Monitors (II.F.1.1)
- 4. Sampling and Analysis of Plant Effluents (II.F.1.2)
- 5. Containment High-Range Radiation Monitor (II.F.1.3)
- 6. Containment Pressure Monitor (II.F.1.4)
- 7. Containment Water Level Monitor (II.F.1.5)
- 8. Containment Hydrogen Monitor (II.F.1.6)

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#### EVALUATION

### 1. Reactor Coolant System Vents (II.B.1)

Nur guidance for RCS vents identified the need for at least one operable vent path at the reactor vessel head and the pressurizer steam space, for Westinghouse reactors. Generic Letter 83-37 also provided limiting conditions for operation and the surveillance requirements for the RCS vents. The licensee has proposed TSs that are consistent with our guidance. We find the proposed TSs to be acceptable.

2. Post-Accident Sampling (II.B.3)

The guidance provided by Generic Letter 83-37 requested that an administrative program should be established, implemented and maintained to ensure that the licensee has the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions. The Post-Accident Sampling System is not required to be operable at <u>all</u> times. Administrative procedures are to be established for returning inoperable instruments to operable status as soon as practicable.

The licensee has provided a proposed revision to paragraph 3G of the Facility Operating License which is consistent with the guidelines provided in our Generic Letter 83-37. We conclude that the licensee has made an acceptable license change for the Post-Accident Sampling System.

### 3. Noble Gas-Effluent Monitors (II.F.1.1)

The licensee has supplemented the existing normal range monitors to provide noble gas monitoring in accordance with Item II.F.1.1. Proposed TSs were submitted that are consistent with the guidelines provided in our Generic Letter 83-37. Therefore, we conclude that the TSs for Item II.F.1.1 are acceptable.

4. Sampling and Analysis of Plant Effluents (II.F.1.2)

The guidance provided by Generic Letter 83-37 requested that an administrative program should be established, implemented and maintained to ensure that the capability to collect and analyze or measure representative samples of radioactive indines and particulates in plant gaseous effluents during and following an accident. The licensee has proposed a revision to paragraph 3G of the Facility Operating License that are consistent with our guidance. We conclude that the license changes for sampling and analysis of plant effluents are acceptable.

# 5. Containment High-Range Radiation Monitor (II.F.1.3)

The licensee has installed two in-containment monitors at Robinson Unit 2 that are consistent with the guidance of TMI Action Plan Item II.F.1.3. Generic Letter 83-37 provided guidance for limiting conditions for operation and surveillance requirements for these monitors. The licensee proposed TSs that are consistent with the guidance provided in our Generic Letter 83-37. Therefore, we conclude that the proposed TSs for Item II.F.1.3 are acceptable.

6. Containment Pressure Monitor (II.F.1.4)

Robinson Unit 2 has been provided with two wide range channels for monitoring containment pressure following an accident. The original containment pressure monitoring system provides backup to the new post-accident monitors. The original system consists of six pressure transmitters with a range of -5 to +75 psig. The licensee has proposed TSs that meet the intent of the guidelines contained in Generic Letter 83-37. Therefore, we conclude that the proposed TSs for containment pressure monitor are acceptable.

7. Containment Water Level Monitor (II.F.1.5)

The containment water level monitors provide the capability required by TMI Action Plan Item II.F.1.5. The original containment water level monitoring system provides backup to the new post-accident monitors. The proposed TSs contain limiting conditions of operation and surveillance requirements that meet the intent of the guidance contained in Generic Letter 83-37. Therefore, we conclude that the proposed TSs for containment water level monitors are acceptable.

8. Containment Hydrogen Monitor (II.F.1.6)

The licensee installed containment hydrogen monitors that provide the capability required by TMI Action Plan Item II.F.1.6. The proposed Technical Specifications contain appropriate limiting conditions for operation and surveillance for these monitors. We conclude that the proposed TSs are acceptable as they meet the intent of the guidance contained in Generic Letter 83-37.

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### 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 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 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: August 29, 1985

Principal Contributor:

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