



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 142 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 February 21, 1992, as supplemented August 7, 1992, the Carolina Power & Light Company (the licensee) submitted a request for changes to the H. B. Robinson Steam Electric Plant, Unit No. 2, Technical Specifications (TS). The requested changes would remove requirements for the fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements recommended by Generic Letter 86-10. The proposed changes would also modify the administrative control requirements of the TS to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by license condition. Guidance on these proposed TS changes was provided to all power reactor licensees and applicants by Generic Letter 88-12, dated August 2, 1988. The August 7, 1992, letter provided an updated TS page that did not change the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, the licensees were requested by Generic Letter 86-10 to incorporate the final NRC-approved Fire Protection Program into their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program, including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection, would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that with the requested actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary.

The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TS. This action was an industry effort to obtain NRC guidance on an acceptable format for license amendment requests to remove fire protection requirements from TS.

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Additionally, in the licensing review of new plants, the staff has approved applicant requests to remove fire protection requirements from TS issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TS for new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from TS.

3.0 EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the TS. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in the TS can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in TS and which are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in the TS. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program, including those technical and administrative requirements removed from the TS, to ensure that nuclear safety is not adversely affected.

These controls include (1) the TS administrative controls that are applicable to the Fire Protection Program; (2) the license condition on implementation of, and subsequent changes to, the Fire Protection Program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the FSAR.

The specific details relating to fire protection requirements removed from TS by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements have been modified to include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained. In addition, the responsibilities of the Operations Review Committee were expanded to include the review of the Fire Protection Program and its implementing procedures and submittal of recommended changes to the Plant Nuclear Safety Committee.

The TS changes proposed by the licensee are in accordance with the guidance provided by Generic Letter 88-12, as addressed in the items below.

1. The requirements of TS 3.14.1 and 4.14.1 (Fire Detection and Actuation Instrumentation), 3.14.2 and 4.14.2 (Fire Suppression Water System), 3.14.3 and 4.14.8 (Fire Water Pre-Action System), 3.14.4 and 4.14.4 (Fire Hose Stations), 3.14.5 and 4.14.3 (CO₂ Fire Protection System), 3.14.6 and 4.14.7 (Halon Fire Protection System), and 3.14.7 and 4.14.5 (Fire Barrier Penetration Seals) have been replaced with the requirements which appear in Section 9.5.1 of the FSAR. The operability and surveillance requirements for these systems will be maintained through plant procedures.
2. TS definition 1.9, FIRE PROTECTION WATER SYSTEM is deleted.

3. TS 6.5.1.6.6(j) (Operations Review Committee Responsibilities) will be added to require the Plant Nuclear Safety Committee (PNSC) to review the Fire Protection Program and any program changes.
4. TS 6.2.3(g) and (h) and the training requirements of TS 6.4.2 are deleted.
5. TS 6.9.3.1 will be revised to remove the special reporting requirements associated with fire protection systems.

The proposed license condition for HBR2 reads as follows:

Carolina Power & Light Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for the facility and as approved in the Fire Protection Safety Evaluation Report, dated February 28, 1978, and supplements thereto. Carolina Power & Light Company may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

As required by Generic Letter 86-10, the licensee confirmed that the NRC-approved Fire Protection Program has been incorporated into the FSAR.

The licensee confirmed that the operational conditions, remedial actions, and test requirements associated with the removed fire protection TS have been included in the Fire Protection Program incorporated into the FSAR. This is in accordance with the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes acceptable.

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to 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 (57 FR 11103, April 1, 1992). 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.

6.0 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.

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Date: December 7, 1992