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KRICH,R.M. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amend to license DPR-23,deleting TS Table 4.1-3,Item 11 requirement to perform hydrostatic test on auxiliary coolant sys headers at five yr intervals.

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PRIORITY 1 DOCUMENT

CP&L

10 CFR 50.90

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

RNP File No: 13510HA
Serial: RNP/94-1504

AUG 11 1994

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
DELETION OF THE AUXILIARY COOLANT SYSTEM HYDROSTATIC TEST

Gentlemen:

In accordance with 10 CFR 50.90, Carolina Power & Light (CP&L) Company hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

This proposed amendment deletes the TS Table 4.1-3, Item 11 requirement to perform a hydrostatic test on the auxiliary coolant system headers at five year intervals. Adequate assurance of system integrity is already provided by the requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI. HBRSEP TS Section 4.0.1 invokes the requirements of ASME Code, Section XI. Additionally, approval of this request will result in a significant safety benefit. This safety benefit is accomplished by reducing the frequency of testing which employs a temporary cooling arrangement for spent fuel pool cooling. HBRSEP off-loads the core during each refueling outage, which increases the heat load (i.e., reduces the time-to-boil if cooling is lost) in the spent fuel pool. The reduced frequency of this test afforded by this proposed TS change will minimize the opportunity for the additional shutdown challenges and risks posed by use of a temporary cooling system. As a result, the additional operational resources and increased system monitoring that are necessary for operating a temporary system during shutdown conditions, would not be required. The proposed revision will result in a savings of approximately $1,940,000 over the lifetime of the plant.

CP&L requests this amendment be issued by February 15, 1995 to support planning for Refueling Outage 16 scheduled for April, 1995.

Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b).

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Enclosure 2 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for CP&L's conclusion is that the proposed changes do not involve a significant hazards consideration.

Enclosure 4 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 5 provides page change instructions for incorporating the proposed revisions.

Enclosure 6 provides the proposed TS pages.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the proposed license amendment.

In order to allow time for procedure revision and orderly incorporation into copies of the TS, CP&L requests that the proposed amendments, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

Please refer any questions regarding this submittal to Mr. K. R. Jury at (803) 383-1363.

Yours very truly,

R. M. Krich
Manager - Regulatory Affairs

DTG:sgk
Enclosures:

1. Affidavit
2. Basis for Change Request
3. 10 CFR 50.92 Evaluation
4. Environmental Considerations
5. Page Change Instructions
6. TS Pages

cc: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. S. D. Ebneter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
Attorney General (SC)

ENCLOSURE 1

Affidavit

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter RNP/94-1504 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

C S Hinnant

Debra W. Mateer
Notary (Seal)

My commission expires: 6/23/98

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
DELETION OF AUXILIARY COOLANT SYSTEM HYDROSTATIC TEST

BASIS FOR CHANGE REQUEST

Proposed Change

This proposed amendment deletes the Technical Specification (TS) Section 4.1.3, Table 4.1-3, Item 11, requirement to perform a five year interval hydrostatic test on the auxiliary coolant system critical headers.

Basis

TS Section 4.1.3, Table 4.1-3, Item 11 requires a five (5) year hydrostatic test on the critical headers of the auxiliary coolant system. This requirement was imposed by the Atomic Energy Commission as a TS addition prior to issuance of H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Operating License. The In-Service Inspection requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI, were not in place at the time of the Operating License issuance. The auxiliary coolant system, hereafter referred to as the Component Cooling Water (CCW) System[1], is not designed to accommodate passive failures of piping within common headers. The Safety Evaluation Report states that because of the lack of passive redundancy for this safety related function, the 5-year hydrostatic test requirement was necessary to further reduce the probability of a passive failure occurring in the common headers. TS Section 4.0.1 requires the CCW system to be tested in accordance with ASME Code, Section XI. Procedures are in place to meet the testing requirements of the ASME Code which include the performance of a ten (10) year system hydrostatic test and a forty (40) month system inservice test. These tests provide an equivalent level of assurance of safety for the CCW system. Therefore, the 5-year hydrostatic test is duplicative and redundant.

The deletion of this test requirement will result in a significant safety benefit. This safety benefit is accomplished by reducing the frequency of testing which employs a temporary cooling arrangement for spent fuel pool cooling. HBRSEP off-loads the core during each refueling outage, which increases the heat load (i.e. reduces the time-to-boil if cooling is lost) in the spent fuel pool. The reduced frequency of this test afforded by this proposed TS change will minimize the opportunity for the additional shutdown challenges and risks posed by use of a temporary cooling system. As a result, the additional operational resources and increased system monitoring that are necessary for operating a temporary system during shutdown conditions, would not be required.

Conclusions

In summary, the current requirements in TS to meet the ASME Code are an improvement over the existing TS requirement, therefore the TS requirement for the 5-year hydrostatic testing on the CCW system critical headers should be deleted.

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[1] The Atomic Energy Commission issued the Safety Evaluation Report by letter dated May 20, 1970 relating to the issuance of the facility license. In the Safety Evaluation Report, the Component Cooling System is described and named as the Auxiliary Coolant System.

Basis (Cont'd)

3. The proposed amendment does not involve a significant reduction in the margin of safety. The proposed change will delete the requirement to perform a hydrostatic test on the component cooling water system at five year intervals to ensure the integrity of the system. However, adequate testing of the system is ensured by the required ASME Code Section XI tests. This testing includes a 10-year system hydrostatic test as well as a 40-month interval system inservice test and provides assurance of system integrity and the ability to perform the intended function. Therefore, there will be no reduction in the margin of safety.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
DELETION OF AUXILIARY COOLANT SYSTEM HYDROSTATIC TEST

10 CFR 50.92 EVALUATION

The NRC has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and concludes that its adoption would not involve a significant hazards determination. The bases for this conclusion are as follows:

Proposed Change

This proposed amendment deletes the Technical Specification Section 4.1.3, Table 4.1-3, Item 11, requirement to perform a 5-year interval hydrostatic test on the Auxiliary Coolant system critical headers.

Basis

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change will delete the requirement to perform a hydrostatic test on the Component Cooling Water (CCW) system at five year intervals to ensure the integrity of the system. However, adequate testing of the system is provided as required by the American Society of Mechanical Engineers (ASME) Code Section XI. This testing includes a 10-year system hydrostatic test as well as a 40-month interval system in-service test and provides assurance of system integrity and the ability to perform the intended function. Therefore, there is no increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change will delete the requirement to perform a hydrostatic test on the CCW system at 5-year intervals to ensure the integrity of the associated system headers. Operating characteristics of the system and its physical configuration will remain unchanged, and the system will continue to perform its intended function. There will be an overall decrease in the frequency of testing the CCW system due to the elimination of redundant testing and a decrease in operational activity associated with testing the CCW system. Since there will be no functional or hardware changes to the system, the proposed change will not create the possibility of a new or different type of accident.

ENCLOSURE 4

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
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ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluent that may be released offsite; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and concludes that the proposed 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 needs to be prepared in connection with the issuance of the amendment. The basis for this conclusion is as follows:

Proposed Change

This proposed amendment deletes the Technical Specification (TS) Section 4.1.3, Table 4.1-3, Item 11, requirement to perform a 5-year interval hydrostatic test on the auxiliary coolant system critical headers.

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 3, the proposed amendment does not involve a significant hazards consideration.

2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. The proposed change deletes a hydrostatic test which is performed at 5-year intervals which is redundant to 10-year system hydrostatic test as well as a 40-month interval system inservice test. No additional effluents and no new effluents would be created as a result of this change. Therefore, the change can not affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change deletes a hydrostatic test which is performed at 5-year intervals which is redundant to 10-year system hydrostatic test as well as a 40-month interval system inservice test. No additional individual or cumulative radiation exposure will result from this change.

ENCLOSURE 5

H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
DELETION OF AUXILIARY COOLANT SYSTEM HYDROSTATIC TEST

PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
4.1-12	4.1-12