

Enclosure 6 to Serial: RNP/94-1870

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
CONTAINMENT SPRAY SURVEILLANCE INTERVAL

TECHNICAL SPECIFICATIONS PAGES

Containment Spray System

4.5.1.3 System tests shall be performed at each refueling interval. The test shall be performed with the isolation valves in the spray supply lines at the containment and spray additive tank blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.

4.5.1.4 *Verify each* ~~The spray nozzles shall be checked for proper functioning at~~ *is unobstructed* ~~least every five years.~~  
*10*

4.5.1.5 The tests discussed in 4.5.1.3 and 4.5.1.4 will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

Containment Fan Coolers

4.5.1.6 Each fan cooler unit shall be tested at intervals not to exceed one month to verify proper operation of all essential features including valves, dampers and piping.

4.5.2 Component Verification

4.5.2.1 When the reactor coolant pressure is in excess of 1,000 psi, it shall be verified at least once per 12 hours (from the RTGB indicators/controls) that the following valves are in their proper position with control power to the valve operators removed.

Valve Number

Valve Position

1- MOV 862 A&B	Open
2- MOV 863 A&B	Closed
3- MOV 864 A&B	Open
4- MOV 866 A&B	Closed

addition, the active components (pumps and signal valves) are to be tested quarterly to check the operation of the starting circuits and to verify that the pumps are in satisfactory running order. The quarterly test interval is based on the judgment that more frequent testing would not significantly increase the reliability (i.e., the probability that the component would operate when required), and that more frequent testing would result in increased wear over a long period of time.

Quarterly testing of valves is consistent with the requirements of ASME Section XI.

Quarterly testing of the safety injection pumps, residual heat removal pumps, containment spray pumps and the boron injection tank isolation valves is not required when in the cold shutdown condition. These components are not required for plant safety when the reactor is in cold shutdown and testing during this condition will result in unnecessary wear on the equipment.

Other systems that are also important to the emergency cooling function are the accumulators, the Component Cooling System, the Service Water System and the containment fan coolers. The accumulators are a passive safeguard. In accordance with Specification 4.1, the water volume and pressure in the accumulators are checked periodically. The other systems mentioned operate when the reactor is in operation and by these means are continuously monitored for satisfactory performance.

With the containment spray pump discharge valves closed and the spray headers drained of any solution, low pressure air or smoke can be blown through test connections. This surveillance requirement ensures that each spray nozzle is unobstructed and provides assurance that spray coverage of the containment during an accident is not degraded. Due to the passive design of the nozzle, a test at 10 year intervals is considered adequate to detect obstruction of the nozzles.

#### References

- (1) FSAR Section 6.2
- (2) FSAR Section 6.4
- (3) FSAR Section 6.1
- (4) CP&L report and supplemental letters of September 29, November 5, December 8, 1971, and March 20, 1972.

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- 4.5.1.4 Verify each spray nozzle is unobstructed at least every 10 years.
- 4.5.1.5 The tests discussed in 4.5.1.3 and 4.5.1.4 will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

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