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SUBJECT: Application for amend to license DPR-23,conforming w/addl provision of guidance provided by GL 90-06 for surveillance testing of block valves associated w/pressurizer PORV.

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P R I O R I T Y 1 D O C U M E N T

CP&L

10 CFR 50.90

Carolina Power & Light Company
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

File No: 13510HA
Serial: RNP/94-1925

FEB 03 1995

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 TECHNICAL SPECIFICATIONS CHANGE
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 90-06, "RESOLUTION OF GENERIC ISSUE 70, 'POWER-OPERATED RELIEF VALVE AND BLOCK VALVE RELIABILITY,' AND GENERIC ISSUE 94, 'ADDITIONAL LOW-TEMPERATURE OVERPRESSURE PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)"

Gentlemen:

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

The requested change will amend our previous TS change request dated June 18, 1992. The requested change will conform with an additional provision of the guidance provided by Generic Letter 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10 CFR 50.54(f)," for surveillance testing of the block valves associated with the pressurizer power-operated relief valves. In addition, editorial changes to the previous TS change request are included along with the correction of current TS page 3.1-11 to revise the reference to two figures that have been superseded in the TS.

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

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

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

Enclosure 4 provides the environmental considerations which demonstrates that the requested change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, in accordance with 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the change to the TS.

Enclosure 5 provides page change instructions for incorporating the requested change.

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 requested change to the TS.

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

Please refer any questions regarding this submittal to Mr. K. R. Jury at (803) 857-1363.

Yours very truly,

R. M. Krich
Manager - Regulatory Affairs

Enclosures:

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

c: 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/94-1925 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

Gail B. Kover

Notary (Seal)

My commission expires: August 19, 2004

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 90-06
"RESOLUTION OF GENERIC ISSUE 70, 'POWER-OPERATED RELIEF VALVE AND BLOCK VALVE RELIABILITY,' AND GENERIC ISSUE 94, 'ADDITIONAL LOW-TEMPERATURE OVERPRESSURE PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)"

BASIS FOR CHANGE REQUEST

Requested Change

This requested Technical Specifications (TS) change amends the previous TS change request dated June 18, 1992, to conform with an additional provision of the guidance provided by Generic Letter 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10 CFR 50.54(f)," for surveillance testing of the block valves associated with the pressurizer power-operated relief valves (PORVs). In addition, editorial changes to the previous TS change request dated June 18, 1992, are included along with the correction of current TS page 3.1-11 to revise the reference to two figures that have been superseded in the TS.

Basis

The previous TS change request included several exceptions to the guidance of Generic Letter 90-06. The NRC has indicated that these exceptions were acceptable with the exception of not performing surveillance testing for block valves when these valves are closed to isolate a leaking pressurizer PORV. A further review of this exception from the guidance of Generic Letter 90-06 has determined that assurance of block valve operability overrides any potential safety concerns associated with unisolating a pressurizer PORV with excessive seat leakage during block valve surveillance testing.

The requested change will establish a TS requirement for full stroke surveillance testing of block valves on a 92 day interval. Generic Letter 90-06 allowed an exception to this testing requirement whenever a block valve is closed to isolate one or more inoperable pressurizer PORVs. In addition to this exception, however, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 previously proposed that surveillance testing of a block valve not be required while that block valve is closed to isolate excessive seat leakage through a pressurizer PORV.

Further review of NRC guidance, primarily provided within Generic Letter 90-06, has identified that the assurance of block valve availability outweighs any potential risks associated with unisolating a pressurizer PORV with excessive seat leakage during block valve surveillance testing. Several accident mitigation strategies provided within the Abnormal and Emergency Operating Procedures rely on the capability to cycle the block valves. For example, a Reactor Coolant System (RCS) "feed and bleed" may be needed in response to a total loss of main and auxiliary feedwater. Core damage could occur if at least one block valve and the associated pressurizer PORV is not available to support this contingency.

In reviewing the safety significance of this change request, it is important to note a distinction between a leaking pressurizer PORV, a pressurizer PORV with excessive seat leakage, and an inoperable pressurizer PORV. Within the proposed TS Section 3.1.1.5 and the associated basis statement, HBRSEP defines pressurizer PORV leakage using the existing guidance for RCS leakage provided within TS Section 3.1.5. Therefore, a pressurizer PORV would be defined as "leaking" with up to and including one gallon per minute (gpm) of seat leakage, but would not be inoperable and would not be experiencing "excessive" seat leakage. With leakage greater than one (1) gpm and up to and including ten (10) gpm, the pressurizer PORV would be considered to have "excessive" seat leakage and would be subject to the compensatory actions described within proposed TS Section 3.1.1.5.a. Power operation may continue with leakage greater than one (1) gpm and up to and including ten (10) gpm through a pressurizer PORV with the associated block valve closed provided block valve surveillance testing on a 92 day interval continues as required by proposed TS Section 4.2.4.2. Finally, with pressurizer PORV leakage exceeding ten (10) gpm, the pressurizer PORV should be considered inoperable in accordance with the requirements of proposed TS Section 3.1.1.5.b and c, and continued block valve surveillance testing would no longer be required.

The additional editorial changes to our previous TS change request dated June 18, 1992, and the correction of the referenced figures in the current TS page 3.1-11 to the superseded figure do not change the basis for our conclusion that the previously proposed changes do not involve a significant hazards consideration. These changes are being requested to provide clarity and consistency to the wording of the TS.

Conclusions

The continued availability of the block valves is found to provide a net safety benefit by assuring the capability for accident mitigation strategies described within the Abnormal and Emergency Operating Procedures. These benefits outweigh any negative safety impacts associated with testing of the block valves on a 92 day interval under conditions where a block valve has been closed to isolate a leaking pressurizer PORV. This proposed revision to the previous TS change request dated June 18, 1992, conforms with the guidance provided by Generic Letter 90-06, and the editorial changes to the previous TS change request, along with the change to the current TS page 3.1-11, are administrative in nature.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 90-06,
"RESOLUTION OF GENERIC ISSUE 70, 'POWER-OPERATED
RELIEF VALVE AND BLOCK VALVE RELIABILITY,' AND GENERIC
ISSUE 94, 'ADDITIONAL LOW-TEMPERATURE OVERPRESSURE
PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)"

10 CFR 50.92 EVALUATION

We have concluded that the requested change to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) to revise our previous TS change request dated June 18, 1992, to conform with an additional provision of the guidance provided by Generic Letter 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10 CFR 50.54(f)," for surveillance testing of the block valves associated with the pressurizer power-operated relief valves (PORVs) along with editorial changes to the previous TS change request dated June 18, 1992, and the correction of current TS page 3.1-11 to revise the reference to two figures that have been superseded in the TS does not involve a Significant Hazards Consideration. In support of this conclusion, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

Basis

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

1. The requested revision does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed revision to our previous Technical Specification (TS) change request dated June 18, 1992, would help assure the availability of the block valves for accident mitigation. The availability of the block valves for accident mitigation has been found to outweigh any negative safety consequences associated with full cycle testing of a block valve isolating a pressurizer power-operated relief valves (PORV) with "excessive" seat leakage. There would be no significant increase in the probability or consequences of an accident previously evaluated since this event is fully bounded by the failing open of a single pressurizer code safety relief valve event which is analyzed in Chapter 15 of the Updated Final Safety Analysis Report. Accordingly, the requested revision will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The requested revision to our previous TS change request does not create the possibility of a new or different kind of accident from any accident previously evaluated. Periodic testing of the block valves in accordance with the requested revision is only intended to assure the functioning and capability of the block valves. The requested revision will only clarify the conditions when block valve surveillance testing is required. The performance of this testing is intended to improve block valve availability and thereby assure the capability of certain accident mitigation strategies identified within Abnormal and Emergency Operating Procedures. Therefore, the requested revision will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The requested revision to our previous TS change request does not involve a significant reduction in the margin of safety. The requested revision is intended to help assure block valve availability to support certain accident mitigation strategies. This additional assurance of block valve availability and functioning increases the margin of safety. Accordingly, the requested revision will not involve a significant reduction in the margin of safety.

CONCLUSION

The continued availability of the block valves is found to provide a net safety benefit by assuring the capability for accident mitigation strategies described within the Abnormal and Emergency Operating Procedures. These benefits outweigh any negative safety impacts associated with testing of the block valves on a 92 day interval under conditions where a block valve has been closed to isolate a leaking pressurizer PORV. This proposed revision to our previous TS change request dated June 18, 1992, conforms with the guidance in Generic Letter 90-06, and the editorial changes to the previous TS change request, along with the change to the current TS page 3.1-11, are administrative in nature.

Based on the above significant hazards evaluation, Carolina Power & Light Company has concluded that the requested change does not involve any significant hazards considerations.

ENCLOSURE 4

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
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ISSUE 94, 'ADDITIONAL LOW-TEMPERATURE OVERPRESSURE
PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)"

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 requested change to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the requested change 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 effluents that may be released off-site; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the requested change 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 change to the Technical Specifications (TS). The basis for this determination follows.

Requested Change

This requested TS change revises our previous TS change request dated June 18, 1992, to conform with an additional provision of the guidance in Generic Letter 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10 CFR 50.54(f)," for surveillance testing of the block valves associated with the pressurizer power-operated relief valves (PORVs). In addition, editorial changes to the previous TS change request dated June 18, 1992, are included along with the correction of current TS page 3.1-11 to revise the reference to two figures that have been superseded in the TS.

Basis

The requested revision 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 requested revision does not involve a significant

hazards consideration.

2. The requested revision does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site. The cycling of a block valve with a leaking pressurizer PORV would result in some leakage from the Reactor Coolant System; however this leakage would be into the pressurizer relief tank which is part of a closed system inside the containment. The availability of the block valve(s) to support certain accident mitigation strategies would help minimize the affects of some core damage scenarios, thereby reducing the types and amounts of potential radioactive releases. As such, the requested revision cannot affect the types or amounts of any effluents that may be released off-site.

3. The requested revision does not result in an increase in individual or cumulative occupational radiation exposure. This requested revision to the previous TS change request only clarifies the conditions when block valve surveillance testing is required. During conditions of pressurizer PORV leakage, the performance of this surveillance testing should have no affect on individual or cumulative radiation exposure. No changes to equipment or modes of operation or testing of equipment will result from this requested change. Therefore, the requested revision has no affect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 5
H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)"

PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
3.1-3f	3.1-3f
3.1-3h	3.1-3h
3.1-5	3.1-5
3.1-6a	3.1-6a
3.1-11	3.1-11
4.2-7a	4.2-7a
4.2-7b	4.2-7b
4.2-7c	4.2-7c