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SUBJECT: Transmits change to Basis for TS Section 4.4.1.2, "Sensitive or LLRT," re operating mode of penetration pressurization sys.

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United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
TECHNICAL SPECIFICATIONS BASIS CHANGE REGARDING CONTAINMENT
PENETRATION PRESSURIZATION SYSTEM

Gentlemen:

This letter transmits a change to the Basis for Technical Specifications (TS) Section 4.4.1.2, "Sensitive or Local Leak Rate Test (SLRT)," regarding the operating mode of the Penetration Pressurization System (PPS). This Basis change clarifies that the PPS may be used in either the continuous or intermittent mode as currently allowed by TS Section 4.4.1.2.a, and 10 CFR 50, Appendix J, "Primary Reactor Leakage Testing for Water-Cooled Power Reactors." This change was reviewed and found acceptable by the Plant Nuclear Safety Committee on July 25, 1995.

TS Section 4.4.1, "Operational Leakage Rate Tests," requires an integrated leak rate test prior to initial plant operations. Subsequent leak rate tests are required at equal intervals between the major shutdowns for inservice inspection (i.e., ten-year intervals), and a Sensitive or Local Leak Rate Test (LLRT) is performed at each refueling outage. TS 4.4.1.2 requires that, with respect to this testing, repairs and retests shall be performed whenever the combined leakage rate of 30 percent of the allowable containment leak rate, L_a, is exceeded. For lesser leaks, repairs are optional. The Basis for TS Section 4.4.1 states that the PPS is in service continuously to monitor leakage from potential leak paths, such as penetrations, double gasketed seals, and spaces between certain containment isolation valves.

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The PPS is a secondary system which pressurizes certain penetrations between inner and outer containment boundaries with air at a slightly higher pressure than the peak containment pressure that would result from a design basis accident. Although not required, the current practice is to use the PPS as a continuous leakage monitoring system for the penetrations served by the system. The TS imposes a leak rate of 30 percent of the allowable containment leak rate as measured by the PPS. Excessive leakage from this system will cause an alarm to alert Operations personnel of the leakage.

No credit is taken for the operation of this system for accident mitigation in the Updated Final Safety Analysis Report (UFSAR) accident analysis, therefore, no Limiting Conditions for Operation (LCO) associated with this system were delineated in the TS. The PPS may be used in the continuous leak rate monitoring mode in lieu of Type B and Type C tests performed on a periodic basis as required by 10 CFR 50, Appendix J, and by TS Section 4.4.1.2.a, for the penetrations that it serves. TS Section 4.4.1.2.b requires that remedial action be taken should leakage from PPS exceed 0.3 L_a. Because the PPS is a 10 CFR 50, Appendix J qualified system for both continuous or intermittent pressurization of individual or groups of containment penetrations as allowed in 10 CFR 50, Appendix J, Items III.B.1(b), III.B.3.(b), and III.C.1, the PPS may be used as either a continuous or intermittent (i.e., periodic) means of satisfying the local leak rate test requirements of both the TS and 10 CFR 50, Appendix J.

The PPS provides a total leak rate for the penetrations it serves, and this leak rate is compared to $0.3L_a$, as required in TS Section 4.4.1.2.b. 10 CFR 50, Appendix J, requires that the total allowable containment leakage from the Type B and Type C leak rate tests shall be less than $0.6L_a$. Additional valves, not served by PPS, are included in the Type C testing program. These valves are locally tested on a refueling interval basis. The acceptance criteria for this grouping of valves tested in this manner is also $0.3L_a$. Therefore, the combination of PPS allowed leakage (i.e., $0.3L_a$) and the allowed leakage from the remainder of the Type C and Type B testing program, (i.e., 0.3 L_a), provides the methodology for assuring that the $0.6L_a$ limit is not exceeded.

On June 30, 1983, Carolina Power & Light (CP&L) Company submitted its 10 CFR 50, Appendix J, testing program to the NRC. A supplemental response to a request for additional information by the NRC was submitted by CP&L by letter dated September 14, 1987. In that response we reiterated that the PPS is designed as a monitoring system capable of continuous or intermittent pressurization.

TS Surveillance Requirement 4.4.1.2.a requires periodic surveillance testing in accordance with UFSAR Section 6.2.4. The practice of using the PPS in the continuous monitoring mode in order to meet the TS Surveillance Requirement 4.4.1.2.a is one of two allowed modes of operation, (i.e., continuous or intermittent), as discussed above.

Conclusion

A change to the Basis for TS Section 4.4.1.2 is acceptable because the configuration of PPS as an intermittent or continuous leakage testing system is an option provided in accordance with 10 CFR 50, Appendix J, is not prohibited by TS Section 4.4.1.2. This change does not increase the probability or consequences of any accident previously evaluated in the safety analysis report, does not increase the probability or consequences of any equipment malfunction as evaluated in the safety analysis report, does not introduce any new possibility of an accident or equipment malfunction not previously analyzed in the safety report, and does not reduce the margin of safety as described in the basis for the applicable TS.

Enclosure 1 provides page change instructions for incorporating the change.

Enclosure 2 provides the revised TS Basis page.

Should you have any questions regarding this matter, please contact Mr. A. L. Garrou at (803) 857-1544.

Very truly yours,

R. M. Krich
Manager - Regulatory Affairs

RDC:rdc
Enclosures
c: 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

ENCLOSURE 1

H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
TECHNICAL SPECIFICATIONS BASIS CHANGE REGARDING
CONTAINMENT PENETRATION PRESSURIZATION SYSTEM

PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
4.4-10	4.4-10

ENCLOSURE 2

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TECHNICAL SPECIFICATION BASIS PAGE