REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8307070172 DOC.DATE: 83/06/30 NOTARIZED: NO DOCKET #
FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261
AUTH.NAME AUTHOR AFFILIATION
ZIMMERMAN,S.R. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Forwards Rev 0 to "HB Robinson Steam Electric Plant,Unit 2, 10CFR50,App J,Testing Program," in response to IE Insp Rept 50-261/82-22.Detailed exemption requests encl.S66 RPT

DISTRIBUTION CODE: A017S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3+20
TITLE: OR Submittal: Append J Containment Leak Rate Testing

NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
	NRR ORB1 BC	01	7	7				
INTERNAL:	~~ELD/HDS1~~	13	1	1	NRR/DSI/CSB	09	1	1
	REG FILE	04	1	1	RGN2		1	1
EXTERNAL:	ACRS	11	10	10	LPDR	03	1	1
	NRC PDR	02	1	1	NSIC	05	1	1
	NTIS		1	1				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25

CP&L

Carolina Power & Light Company

SERIAL: LAP-83-289

June 30, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
10 CFR 50, APPENDIX J TESTING PROGRAM

Dear Mr. Varga:

Carolina Power & Light Company is herewith transmitting to NRC two copies of the H. B. Robinson Plant program for meeting the testing requirements of 10 CFR 50, Appendix J. This program was developed in response to suggestions by NRC Region II personnel related to I.E. Inspection Report 82-22 and is consistent with the requirements of Appendix J, Section III. The intent of the program is to formally establish a plant position on the requirements of Appendix J which will govern future testing activities.

Enclosure 1 details exemption requests from certain Appendix J requirements. These requests also appear in the program. Carolina Power & Light Company requests your comments on this program, and in the absence of any comments, we will assume that the program is acceptable.

If you have any questions, please contact a member of our Nuclear Licensing Unit Staff.

Yours very truly,

S. R. Zimmerman
Manager
Licensing & Permits

FMG/ONH/kjr (7258ONH)

Enclosure 1: Exemption Requests
Enclosure 2: 10 CFR 50, Appendix J Testing Program

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)

A017
1/1

8307070172 830630
PDR ADOCK 05000261
Q PDR

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

ENCLOSURE 1

EXEMPTION REQUESTS

A) Type A Test Exemption Requests

1) Specific Exemption Request:

Repairs and adjustments made during a Type A test.

Applicable To:

All containment penetrations.

Basis For Exemption Request:

Appendix J, Section III.A.1(a) requires termination of a Type A test to repair or adjust equipment that exhibits leakage that could cause leakage rates to exceed the acceptance criteria. Should such leakage be observed during a Type A test, if the leakage can be isolated by not affecting the leaking component directly and the component has a design that permits local leakage rate testing, the Type A test may not be terminated.

Alternate Testing:

The leaking component(s) will be locally tested in the "as found" condition following the Type A test, and these results added to the measured Type A test leak rate. Should results of the local test warrant maintenance on the component(s), the "as left" leakage rate(s) will be added to the Type A test results.

2) Specific Exemption Request:

Increased interval for Type A tests following two consecutive failed tests, Appendix J, Section III.A.6(b).

Applicable To:

All Type A tests.

Basis For Exemption Request:

As stated in the Exemption Request 1, local testing after isolation of a leakage path(s) found during Type A testing may be attempted. In the event that this local testing indicates leakage, when added to Type A rates results in unacceptable total leakage, a corrective action plan is proposed. In these instances when test failure is due to an identifiable component(s), the corrective action plan may involve engineering evaluation, repair or replacement of the component(s), and/or increasing the frequency of local leakage rate surveillance on the faulty component(s).

tgm

A) Type A Test Exemption Requests (Continued)

This component-specific corrective action plan will be aimed at correcting the identifiable leakage path(s) without imposing the excessive penalty of an increased Type A testing frequency. In these situations when determining a Type A test satisfactory or unsatisfactory for the purpose of implementing a correction action plan, the criteria listed below will be applied.

A corrective action plan will be necessary if:

The total of "as found" leakage rate(s) for a component(s) isolated during a Type A test plus Type A test results is greater than or equal to L_t or L_a, as applicable. The criteria of L_t or L_a in lieu of 0.75 L_a or 0.75 L_t is used in this case since the 0.75 factor is intended to provide a deterioration allowance between Type A tests.

It is emphasized that this criteria is established for the sole purpose of determining the need for implementing a corrective action plan for an isolated, later tested component(s).

In no instance will the plant be returned to service if the total Type A leakage is greater than 0.75 L_t or 0.75 L_a, as applicable (see Technical Specification 4.4.1.1.(f).(3).

tgm