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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
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 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Application for amend to License DPR-23, revising Tech Specs to incorporate criteria & appropriate surveillances for max closure time for containment purge valves.

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Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing - A
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
REQUEST FOR LICENSE AMENDMENT
CONTAINMENT VENTING AND PURGING

Dear Mr. Rubenstein:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2). This requested revision would incorporate criteria and appropriate surveillances within the HBR-2 TS for maximum closure time for the containment purge valves.

BACKGROUND

A similar version of this TS change was originally submitted by CP&L on June 20, 1980 in response to an NRC request to incorporate containment purge and vent valve closing time criteria as a TS requirement. On December 5, 1983 the NRC requested a supplemental TS change request on this issue. By letter dated February 7, 1984, CP&L requested concurrence to defer submittal of the requested supplemental TS change and withhold issuance of the TS change until the new containment purge valves were installed. In a subsequent July 2, 1984 letter, CP&L identified procurement problems which precluded plans to install the new valves during the steam generator replacement outage as planned and requested deferral of the commitment to submit the associated TS change until three months prior to placing the new purge valves in service. This submittal supports that commitment.

DISCUSSION

This amendment request provides operational and surveillance criteria regarding the use and capabilities of the Containment/Purge Supply and Exhaust Isolation Valves. These criteria provide greater assurance of the plant's ability to adequately control potential off-site releases associated with the use of the Containment Purge and Vent System. Analysis has shown that the 42 inch purge system valves must be capable of closure within two seconds under LOCA conditions in order to preclude excessive off site exposure.

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The 42 inch valves were tested and demonstrated capable of closure within two seconds under LOCA conditions when opened at an angle of 70 degrees or less. In previous correspondence on this matter, CP&L was requested to consider inclusion of this 70 degree opening limit within the TS. However, the new valves, as procured from the vendor, have been modified so that the travel is physically limited to a maximum of 70 degrees. Any action to increase this opening angle would require a plant modification with appropriate safety evaluations and approvals. Therefore, inclusion of the 70 degree opening restrictions within the TS is not necessary or appropriate.

Unlike the previously proposed version of this TS amendment, this submittal does not include the six inch vent valves (V12-10, V12-11, V12-12, and V12-13) in the two second closure requirement. Since the potential release rate through these valves is much lower than that of the 42 inch valve, the requirement for two second closure time is overly restrictive and not necessary to ensure adequate control of a potential release. Operability requirements for these valves are already adequately addressed within the provisions of the containment isolation specification.

This amendment request involves the following changes to the TS:

- o Section 3.6, page 3.6-3:

- Subsection 3.6.4 has been added to incorporate the requirement that the Containment Purge Supply and Exhaust Isolation Valves shall be capable of closing within two seconds. Non-compliance with this criterion requires that the valve be declared inoperable and the action statements of TS 3.6.3 are imposed.

- o Basis to Section 3.6, page 3.6-3:

- A statement has been added to the basis to provide guidance concerning justifiable causes for purging during normal plant operation.

- In addition, a statement has also been added to identify the limiting conditions which established the maximum closing time criteria.

- o Section 4.4, page 4.4-8:

- A surveillance has been implemented by Section 4.4.5 to verify compliance with the criterion for closing time stipulated within TS 3.6.4.

SIGNIFICANT HAZARDS

Carolina Power & Light Company has reviewed this amendment request in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed change would involve no significant hazards consideration. This involved an evaluation of the proposed change with respect to the criteria restated below.

A proposed amendment to an operating license...involves no significant hazards considerations 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; or*

- (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 determined that:

- (1) The requested amendment does not involve a significant increase in the probability or consequences of a previously evaluated accident because the change would add requirements and surveillances which provide greater assurance that the purge valves can perform their isolation function within the response time assumed in the Emergency Core Cooling Analysis. Thus, the change would help ensure that the plant was capable of mitigating the consequences of any related accidents.

In addition, the Basis of Section 3.6 provides guidance as to what constitutes justifiable cause for opening these valves under normal plant operation. Since TS guidance in this area did not previously exist, this is considered to provide greater control in this area and therefore could not adversely affect any of the stated criteria.

- (2) The requested amendment does not create the possibility of a new or different kind of accident than previously evaluated because the change does not affect any equipment, systems, operating parameters, or procedures which could change the operation of the plant. The change merely imposes requirements to verify operability of the affected valves and take conservative action when these operating criteria can not be verified.
- (3) The requested amendment does not involve a significant reduction in a margin of safety because no existing requirements or limitations are in any way relaxed or superseded.

To further substantiate this no significant hazards conclusion, CP&L has reviewed the guidance provided by "Example of Amendments Considered Not Likely to Involve Significant Hazards Consideration," as published in the Federal Register (48 FR 14864). This requested change is comparable to example (ii) of that NRC guidance which provides that a change would likely be found to involve no significant hazards consideration if it "constitutes an additional limitation, restriction, or control not presently included in the TS."

ADMINISTRATIVE

The revised version of the TS pages affected by this request are included as an enclosure for your use.

Since the original submittal of this TS change (June 20, 1980) included a \$4000 check in payment of a processing fee, the \$150 amendment application fee routinely provided in accordance with 10 CFR 170.12 has not been included with this submittal.

If you have any questions concerning this request, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,



A. B. Cutter - Vice President
Nuclear Engineering & Licensing

ABC/MDM/ccc (3059MDM)

Enclosure

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein 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.

My commission expires: 11/27/89



Notary (Seal)

