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FROM: Carolina Power & Light Company Raleigh, N.C. 27602 Mr. E.E. Utley		DATE OF DOC	DATE REC'D		LTR	MEMO	RPT	OTHER	
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DESCRIPTION:

Ltr request change to tech specs to delet the requirement for the Isolation Seal Water System to be operable for critical operation of the H.B. Robinson Plant...

ENCLOSURES:

ACKNOWLEDGED

DO NOT REMOVE

PLANT NAME:

H.B. Robinson

		FOR ACTION/INFORMAT	TION	2-6-74	JB	
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January 28, 1974

File: NG-3514

Serial: NG-74-80

50-261

Mr. John F. O'Leary
Directorate of Licensing
Office of Regulation
U.S. Atomic Frency Commission

U. S. Atomic Energy Commission Washington, D. C. 20545

Dear Mr. O'Leary:

H. B. ROBINSON UNIT NO. 2 LICENSE DPR-23

REQUEST FOR REVISION OF TECHNICAL SPECIFICATIONS

It is requested that the requirement for the Isolation Seal Water System to be operable for critical operation of the H. B. Robinson Plant be deleted from our Technical Specifications. The exact change is as follows:

Reference

Change

1. Section 3.3.6

- 1. Delete
- 2. Basis for Section 3.3.6 (one paragraph 2. Delete concerning this system).

We believe that this system should not be required for plant operation since no credit is given for its operation in the FSAR (Section 5.2.2.4 Design Basis). Realizing that this system adds conservatism to the containment system, we intend to maintain and keep the system in operation; however, this should not be a requirement of the Technical Specifications. The FSAR (Section 5.2.2.4 Design Evaluation) further states that "no detrimental effect on any other safeguards system will occur should seal water system fail to operate." This statement further supports the argument that system operation should not be required for critical operation.

This requirement is overly restrictive in that inoperability of a system which merely adds design conservatism should not jeopardize plant operation. The Technical Specification (Table 4.1-3 Item 15) requiring a refueling interval check of the system is acceptable, since we intend to maintain the system. This check would insure us of proper performance or of areas requiring maintenance.

Mr. John F. O'Leary - 2 -January 28, 1974 This request is made in effort to remove an item from the Technical Specifications which might unnecessarily prevent normal plant operation. The change will not, in the opinion of Carolina Power & Light Company, result in an increase in hazard to the health and safety of the public. Yours very truly, Vice-President Bulk Power Supply CWC:DBW:mvp cc: Messrs. N. B. Bessac B. J. Furr B. Howell D. V. Menscer D. B. Waters