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Carolina Power & Light Company

April 2, 1973

Mr. John F. O'Leary, Director Directorate of Licensing U. S. Atomic Energy Commission Washington, D. C. 20545

80-261



Dear Mr. O'Leary:

## H. B. ROBINSON UNIT NO. 2 LICENSE DPR-23 REQUEST FOR REVISION OF TECHNICAL SPECIFICATIONS

The following changes to H. B. Robinson Plant Technical Specifications and Bases are requested for the reasons indicated. Your consideration of these proposals is appreciated.

Section 3.1.2.4B:

Reason:

Section 3.1.5, Basis:



Revise last sentence of first paragraph to read (in part): "...as revised by 3.1.2.4A above."

Typographical error.

Modify the fifth paragraph (concerning leakage to the containment) to read as follows and delete the sixth paragraph (beginning with "leaks less than 1 gpm..."): "If leakage is to the containment, it may be detected by one or more of the following methods:

"A. The containment air particulate monitor is sensitive to low leak rates.

"B. The containment radiogas monitor is less sensitive, but can be used as a backup to the air particulate monitor.

"C. The humidity detector provides a backup to (A) and (B).

"D. A leakage detection system determines leakage losses from water and steam systems within the containment. This system collects and measures moisture condensed from the containment atmosphere by cooling coils of the main recirculation units.

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Section 3.1.5, Basis (Cont'd):

Reason:

"E. Liquid inventory is used for primary system leakage measurement. The systems described in A-D above are used for on-line leakage detection only."

This change deletes the sensitivity of the various systems. These numbers were design conditions and cannot be readily demonstrated to be correct. The presence of the five methods which are independent and capable of detecting leakage into the containment will provide early notification. The primary and most accurate method of measuring primary system leakage will continue to be liquid inventory.

Modify paragraph (C) to read: "One boric acid tank may be out of service indefinitely provided a minimum of 3080 gallons of 20,000 to 22,500 ppm boron solution at a temperature of at least 145 degrees F. is contained in the operable tank."

This change keeps an adequate supply of boric acid on hand at all times while at the same time allowing one tank to be either out of specification or service. This change does not conflict with the two operable flow paths specification, therefore, will not prevent safe operation of the plant.

Identify the existing paragraph as "3.3.6.1" and add the following: "3.3.6.2 During power operation, one of the two automatic actuation valves, associated piping, or actuating signal may be inoperable for a period not to exceed 24 hours provided the redundant equipment is demonstrated to be operable prior to initiating repairs. If the system does not meet the requirements of 3.3.6.1 within 24 hours, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures. If the requirements of 3.3.6.1 are not satisfied within an additional 48 hours, the reactor shall be placed in the cold shutdown condition utilizing normal operating procedures."

Section 3.2.3:

Reason:

Section 3.3.6, Isolation Seal Water System:

Reason:

This addition clarifies the Technical Specification in a manner such that maintenance may be performed on redundant equipment. Prior to maintenance redundant portions of the system will have been checked to ensure that the system is capable of performing its design function.

On Page 3.4-3, change the units of X/Q to "sec/m<sup>3</sup>" instead of "m<sup>3</sup>/sec" and add the following after line beginning "0.1 = equivalent...": "DCF = Dose Conversion Factor".

Typographical error and omission.

Change second sentence to read (in part): "The 480-volt equipment...".

Typographical omission.

Change submittal date to read as follows: "Upon completion of the Test at 3 and 20 years of operation."

This change is consistent with Section 4.4.4.2A which calls for containment vessel tests at 3 and 20 year intervals.

Very truly yours,

E. E. Utley

Vice-President Bulk Power Supply

Reason:

Section 3.7, Basis:

Section 3.4, Basis:

Reason:

Section 6.6.5.2F:

Reason:

DBW/za

cc: Mr. C. D. Barham Mr. N. B. Bessac Mr. B. J. Furr Mr. D. V. Menscer