

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

CAROLINA POWER AND LIGHT COMPANY)
(H. B. Robinson, Unit 2))

)
)
)
) Docket No. 50-261
)

EXEMPTION

I.

The Carolina Power and Light Company (the licensee) is the holder of Operating License No. DPR-23 (the license) which authorize operation of the H. B. Robinson, Unit No. 2 located in Darlington County, South Carolina at steady state reactor core power levels not in excess of 2300 megawatts thermal (rated power). This license provides, among other things, that it is subject to all rules, regulations and Orders of the Commission now or hereafter in effect.

II.

Section 50.54(o) of 10 CFR Part 50 requires that primary reactor containments for water cooled power reactors be subject to the requirements of Appendix J to 10 CFR Part 50. Appendix J contains the leakage test requirements, schedules, and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. Appendix J was published on February 14, 1973 and in August 1975 each licensee was requested to review the extent to which each facility met the requirements.

On August 7, 1975, Carolina Power and Light Company (CP&L) submitted their evaluation of the H. B. Robinson Unit No. 2 (Robinson 2). The CP&L

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- 2 -

submittal for Robinson-2 was supplemented by letter dated September 21, 1977. In these submittals, CP&L requested that certain testing frequencies be exempted from Appendix J requirements. The Franklin Research Center, as consultant to the NRR, has reviewed the licensee's submittals and prepared a Technical Evaluation Report on their findings. The NRC staff has reviewed this report and, in its Safety Evaluation Report dated August 5, 1981, the staff has concurred in the report's bases and findings. The exemption request found to be acceptable is as follows:

CP&L requested an exemption from the requirements of §III.D.2.b.iii of Appendix J relating to testing the integrity of air locks after they have been opened during periods when containment integrity is required by the plant's Technical Specifications. This section requires that the air lock shall be tested within 3 days after being opened, or at least every 3 days if the air locks are opened frequently. Air lock door seal testing shall not be substituted for the 6-month test of the entire air lock as required by §III.D.2.b.i.

For certain types of reactors frequent usage of air locks is needed. Testing of air locks after each opening may represent a situation which results in a more rapid degradation of the critical isolation barriers being tested. In addition, experience obtained since 1969 from testing of airlocks indicates that only a few airlock tests have resulted in greater than allowable leakage rates. The licensee, CP&L, applies continuous pressurization at a pressure of P_a (pressure related to the design basis accident) between the double-gasketed seals of the Robinson-2 airlock. This is an acceptable method to

- 3 -

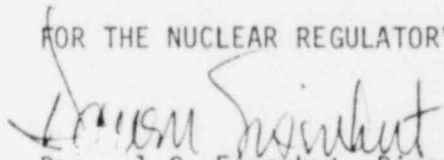
detect door seal leakage while eliminating the impracticalities and possible reduction in reliability associated with full airlock testing at P_a after each opening.

III.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, an exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, the Commission hereby approves the exemption request identified above.

The NRC staff has determined that the granting of this exemption will not result in any significant environmental impact and that pursuant to 10 CFR 51.5(d)(4), an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with this action.

FOR THE NUCLEAR REGULATORY COMMISSION



Darro T. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland
this 28th day of December 1981.

Attachments:

1. Safety Evaluation Report
2. Technical Evaluation Report