



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20565

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 34 TO FACILITY LICENSE NO. DPR-23

CAROLINA POWER AND LIGHT COMPANY

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

Introduction

By letter dated December 2, 1977, Carolina Power and Light Company (the licensee) requested changes to the Technical Specifications appended to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson 2). The changes would revise the testing requirements for the containment spray additive valves and the refueling water storage tank outlet valves.

Discussion

By letter dated November 17, 1976, we provided the licensee guidelines for excluding the exercising tests of certain valves during plant operation. One of these guidelines states that "All valves whose failure in a non-conservative position during the cycling test would cause a loss of system function should not be exercised."

The licensee has identified the following two groups of valves now required to be cycled which do not meet this guideline. Technical Specification 4.5.2.4 currently requires the cycling of the spray additive valves once per month. In order to perform this test it is necessary that the entire containment spray system be placed in an inoperable condition. Technical Specification 4.5.2.6 requires that the outlet valves for the refueling water storage tank be cycled during the monthly safety injection and RHR pump tests. When these valves are closed the safety injection and containment spray systems are made inoperable.

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Evaluation

Following the guidance provided by NRC, the licensee determined that cycling of the containment spray additive valves requires that the entire containment spray system be placed in an inoperable condition. The licensee also stated that the cycling of the refueling water storage tank outlet valves places the entire safety injection and containment spray systems in an inoperable condition. Failure of the cycled valves during this test could result in a loss of function for these systems. Therefore, these valves following our November 17, 1976 guidance, should not be cycled during plant operation. In place of testing during plant operation, the licensee has proposed to test these valves during cold shutdown but not more frequently than quarterly. This proposal is consistent with 10 CFR 50.55a which uses as a reference, Section XI of the ASME Boiler and Pressure Vessel Code.

Based on our evaluation, we find these changes as proposed by the licensee are acceptable with one exception. In our judgment, a cold shutdown lasting 48 hours or more provides ample time to perform these tests. We discussed this with the licensee who agreed to a reduction of the proposed figure of 72 hours.

Environmental Consideration

We have determined that this amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that this amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment involves neither a significant increase in the probability or consequences of accidents previously considered nor a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable

assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: October 6, 1978