



Serial: RNP-RA/11-0095

FEB 10 2012

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/RENEWED LICENSE NO. DPR-23

REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE REGARDING MISSED  
SURVEILLANCES USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc., is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed amendment would modify the TS requirements for missed surveillances as provided within Surveillance Requirement (SR) 3.0.3.

Attachment I provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications.

Attachment II provides the existing TS pages marked up to show the proposed change.

Attachment III provides the revised TS pages.

Attachment IV provides a summary of the regulatory commitments made in this submittal.

Attachment V provides the existing TS Bases pages marked up to show the proposed changes to the Bases.

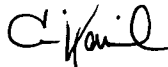
Approval of the proposed license amendment is requested by November 3, 2012, with the amendment being implemented within 120 days of issuance.

In accordance with 10 CFR 50.91, a copy of this application is being provided to the State of South Carolina.

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If you should have any questions regarding this submittal, please contact Mr. R. Hightower at (843) 857-1329.

Sincerely,



Chris Kamilaris  
Manager - Support Services - Nuclear

CK/dfs

- Attachments:
- I. Description and Assessment
  - II. Proposed Technical Specification Changes
  - III. Revised Technical Specification Pages
  - IV. Regulatory Commitments
  - V. Proposed Changes to Technical Specifications Bases

c: Ms. S. E. Jenkins, Manager, Infectious and Radioactive Waste Management Section (SC)  
Mr. V. M. McCree, NRC, Region II  
Ms. A. T. Billoch-Colon, NRC Project Manager, NRR  
NRC Resident Inspectors, HBRSEP  
Attorney General (SC)

### **AFFIRMATION**

The information contained in letter RNP-RA/11-0095 is true and correct to the best of my information, knowledge, and belief; and the sources of my information are officers, employees, contractors, and agents of Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 2/10/12



C. Kamilaris  
Manager - Support Services - Nuclear,  
HBRSEP, Unit No. 2

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

**DESCRIPTION OF THE PROPOSED CHANGE, THE REQUESTED  
CONFIRMATION OF APPLICABILITY, AND PLANT-SPECIFIC VERIFICATIONS**

## **1.0 DESCRIPTION**

The proposed amendment would modify the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Technical Specifications (TS) requirements for missed surveillances as provided within Surveillance Requirement (SR) 3.0.3.

The proposed changes are consistent with the NRC-approved Technical Specifications Task Force (TSTF)-358, Revision 6, which is equivalent to TSTF-358, Revision 5, as modified by Federal Register Notice 66FR32400, dated June 14, 2001, and in response to public comments. The availability of this TS improvement was published in Federal Register Notice 66FR49714 on September 28, 2001, as part of the Consolidated Line Item Improvement Process (CLIIP).

## **2.0 ASSESSMENT**

### **2.1 Applicability of Published Safety Evaluation**

Carolina Power and Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc. has reviewed the model safety evaluation (SE), dated June 14, 2001, associated with the SR 3.0.3 CLIIP. This review included the NRC staff's evaluation, as well as the supporting information associated with TSTF-358. Accordingly, CP&L has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to HBRSEP, Unit No. 2, and justify this amendment for the incorporation of the proposed changes into the HBRSEP, Unit No. 2, TS.

### **2.2 Optional Changes and Variations**

This amendment request proposes no variations or deviations from the TS changes described in the fully modified TSTF-358, Revision 5, i.e., TSTF-358, Revision 6, or the NRC staff's model SE dated June 14, 2001.

### **3.0 REGULATORY ANALYSIS**

#### **3.1 No Significant Hazards Consideration Determination**

HBRSEP, Unit No. 2, has reviewed the proposed no significant hazards consideration determination published in the June 14, 2001 Federal Register Notice as part of the Consolidated Line Item Improvement Process (CLIIP). This review has concluded that the proposed no significant hazards consideration determination presented in the Federal Register is applicable to HBRSEP, Unit No. 2, and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

#### **3.2 Verification and Commitments**

As discussed in the June 14, 2001 Federal Register Notice for this TS improvement, plant-specific verifications were performed as follows:

HBRSEP, Unit No. 2, has established TS Bases for SR 3.0.3 which state that use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

Additionally, the HBRSEP, Unit No. 2, TS Bases will be revised to include details on how to implement the new requirements. These TS Bases changes provide guidance for surveillance frequencies that are not based on time intervals, but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the revised TS Bases will state that a missed surveillance is expected to be performed at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The TS Bases will also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182. In addition, the TS Bases will state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The TS Bases will also state that the results of the risk evaluation will be used to determine the safest course of action and that missed surveillances will be placed into the Corrective Action Program. The requirements of the HBRSEP, Unit No. 2, TS Bases Control Program, as described in TS 5.5.14, is consistent with Section 5.5 of NUREG-1431, "Standard Technical Specifications - Westinghouse Plants."

The proposed changes to the HBRSEP, Unit No. 2, TS Bases pages are provided for informational purposes within Attachment V to this amendment request.

#### **4.0     ENVIRONMENTAL EVALUATION**

CP&L has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001, as part of the CLIIP. It has been concluded that the NRC staff's findings presented in that evaluation are applicable to HBRSEP, Unit No. 2, and the evaluation is hereby incorporated by reference for this application.

United States Nuclear Regulatory Commission  
Attachment II to Serial: RNP-RA/11-0095  
2 Pages (including cover page)

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

**PROPOSED TECHNICAL SPECIFICATIONS CHANGES (MARK-UP)**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1      SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCDs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCD. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCD except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2      The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3      If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCD not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~. This delay period is permitted to allow performance of the Surveillance.

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A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

(continued)



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Attachment III to Serial: RNP-RA/11-0095  
2 Pages (including cover page)

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

**REVISED AND RETYPED TECHNICAL SPECIFICATIONS PAGES**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1           SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2           The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3           If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

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

**REGULATORY COMMITMENTS**

CP&L will adopt the Technical Specification Bases changes as shown in Attachment V upon implementation of this license amendment.

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Attachment V to Serial: RNP-RA/11-0095  
4 Pages (including cover page)

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

**PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS BASES PAGES**

## BASES

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### SR 3.0.2 (continued)

The requirements of regulations take precedence over the TS. The TS cannot in and of themselves extend a test interval specified in the regulations.

Therefore, there is a Note in the Frequency stating, "SR 3.0.2 is not applicable."

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

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### SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

greater

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel,

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BASES

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SR 3.0.3  
(continued)

the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

Insert 1

When a Surveillance with a Frequency based not on time intervals but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a delay period for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

Insert 2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCD Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCD Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the

(continued)

## **BASES INSERTS**

### **Insert 1**

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

### **Insert 2**

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown.

The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. Missed Surveillances will be placed into the Corrective Action Program.