

## NRR-PMDAPEm Resource

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**From:** Lingam, Siva  
**Sent:** Wednesday, January 08, 2014 10:27 AM  
**To:** richard.hightower@pgnmail.com  
**Cc:** Quichocho, Jessie; Elliott, Robert; Waig, Gerald; Matharu, Gurcharan  
**Subject:** RE: H. B. Robinson, Unit 2 - RAIs for LAR Associated with Modification to TS 3.8.1 Regarding Diesel Generator Testing Requirements (TAC No. MF2717)

The following comment was developed as a result of the NRC staff's review of the Duke Energy Progress, Inc (the licensee), license amendment request (LAR), dated September 10, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13261A289), regarding the proposed Technical Specification (TS) changes related to H. B. Robinson Steam Electric Plant, Unit No. 2 TS Limiting Condition for Operation 3.8.1, Required Action B.3.2.2, "One DG Inoperable – Perform SR 3.8.1.2 for OPERABLE DG within 96 hours."

In order to complete the review, the NRC staff requests the licensee to address the following comment.

The proposed change addresses the discovery of any new DG failure mechanism requiring corrective maintenance during preplanned maintenance or testing by including the following in the TS Bases:

"At any point during the preplanned maintenance or testing, if any new failure requiring corrective maintenance is detected, Required Action B.3.2.2 must be entered for the OPERABLE DG. If the 96 hour Completion Time has expired at the point of discovery of the failure requiring corrective maintenance, then at the time of discovery Required Action B.3.1 must be entered for the OPERABLE DG."

Comment:

Contrary to Title 10 of the *Code of Federal Regulations*, Part 50, Section 50.36 (a)(1), the above TS Required Actions (enter Required Action B.3.1/B3.2.2) are proposed to be located in the TS Bases. The TS is silent on the proposed Action requirements allowing continued operation in the Modes of Applicability upon discovery of a new failure mechanism requiring corrective maintenance. Please provide the appropriate TS Required Action(s), Note(s) or Completion Time(s) in accordance with this regulation to avoid the TS Bases from becoming part of the TS, within 30 days from the date of this e-mail.

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**ADAMS Accession No. ML13298A135**

**From:** Lingam, Siva  
**Sent:** Monday, October 21, 2013 4:34 PM  
**To:** Connelly, Scott ([Scott.Connelly@duke-energy.com](mailto:Scott.Connelly@duke-energy.com))  
**Cc:** Broadus, Doug; Quichocho, Jessie; Zimmerman, Jacob; Elliott, Robert; Mathew, Roy; Matharu, Gurcharan; Waig, Gerald; Hemphill, Khadijah; [richard.hightower@pgnmail.com](mailto:richard.hightower@pgnmail.com)  
**Subject:** H. B. Robinson, Unit 2 - Acceptance Review of LAR Associated with Modification to TS 3.8.1 Regarding Diesel Generator Testing Requirements (TAC No. MF2717)

By letter dated September 10, 2013 (ADAMS Accession No. ML13261A289), Duke Energy submitted a license amendment request (LAR) for H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed change would revise H. B. Robinson Steam Electric Plant's Technical Specification Limiting Condition for Operation 3.8.1, Required Action (RA) B.3.2.2, "One DG [Diesel Generator] Inoperable – Perform SR [Surveillance Requirement] 3.8.1.2 for OPERABLE DG within 96 hours," by a NOTE clarifying RA B.3.2.2 which states, "Not required to be performed when the cause of the inoperable DG is pre-planned maintenance and testing." The purpose of this e-mail is to provide the results of the NRC staff's acceptance review of this LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

If you have any questions, please contact me.

Siva P. Lingam  
U.S. Nuclear Regulatory Commission  
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3.8.1 Regarding Diesel Generator Testing Requirements (TAC No. MF2717)  
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