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 CHERNOFF, H.K. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

~~See Proposed~~
 Change to
 Tech Specs

SUBJECT: Application for amend to License DPR-23, improving std TS
 consistent w/NUREG-1431, "Std Tech Specs-Westinghouse
 Plants," Rev 1 Errata 2.

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**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA

Serial: RNP-RA/97-0011

JAN 17 1997

United States Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
CONVERSION TO IMPROVED STANDARD TECHNICAL
SPECIFICATIONS CONSISTENT WITH NUREG-1431, "STANDARD
TECHNICAL SPECIFICATIONS-WESTINGHOUSE PLANTS," REVISION 1
ERRATA 2

Gentlemen:

By letter dated August 27, 1996, Carolina Power & Light (CP&L) Company submitted a request for a change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, in accordance with 10 CFR 50.90. The proposed change will convert the HBRSEP, Unit No. 2 TS to be consistent with NUREG-1431, "Standard Technical Specifications-Westinghouse Plants," Revision 1.

In a letter dated December 17, 1996, CP&L noted that the NRC has identified certain electronic media files that were provided for use by the NRC which do not correspond to the printed information contained within our submittal. CP&L has determined that the discrepancies were in the printed information in the submittal rather than the electronic media files. The cause of the discrepancies was a failure to print out the latest information during finalization of the submittal. As a result of the discrepancies, a review of the submittal package was performed to verify that identified changes in the Current Technical Specifications (CTS) were included in the Discussion of Changes (DOCs), and that identified changes to NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1 and bases sections were included in the Justification of Differences. The review found that discrepancies existed in four printed files contained in Enclosure 17 and one printed file contained in Enclosure 19 to our letter dated August 27, 1996. Errors noted during the review

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Highway 101 and SC 23 Hartsville SC

United States Nuclear Regulatory Commission

Serial: RNP-RA/97-0011

Page 2 of 2

have been corrected in the form of revised pages to be inserted into our submittal that are attached to this letter.

The review above and additional reviews conducted in the course of developing procedures to Implement the Improved Technical Specifications (ITS) have resulted in identification of a small number of additional errors unrelated to the electronic file discrepancies. These errors have also been corrected in the form of revised pages to be inserted into our submittal and are included in the attachment to this letter.

In order to identify changes on the revised pages to our submittal, a side bar has been placed on the right margin of the revised page where the change has been made. With the exception of a revised footing, the revised pages associated with the electronic media file discrepancies are identical to the electronic media files already provided to the NRC and thus do not contain side bars in the right margin, except for one unrelated correction that was identified by a side bar in the right margin. In order to clearly identify changes to revised markup pages, the side bars in the right margin include an "E" inside a circle at the top of the bar.

Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b).

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of this letter with the enclosure and attachment.

If you have any questions concerning this matter, please contact me at (803) 857-1437.

Very truly yours,



H. K. Chernoff

Supervisor - Licensing/Regulatory Programs

ALG/alg

Enclosures:

1. Affidavit

Attachment

c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
Mr. B. B. Desai, USNRC Resident Inspector, HBRSEP
Attorney General (SC) (w/out Enclosures)
Lockheed Idaho Technology, Inc.

Affidavit

State of South Carolina

County of Darlington

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter 97-0011 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

C S Hinnant

Sworn to and subscribed before me

this 17th day of JANUARY 1997

(Seal) Barbara Darnell

Notary Public for South Carolina

My commission expires: 4/17/2001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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TECHNICAL SPECIFICATIONS-WESTINGHOUSE PLANTS," REVISION 1
ERRATA 2

Instructions for Removing and Inserting Pages.

Attached pages are to be inserted into enclosures to our letter dated, August 27, 1996, in accordance with the following remove and insert instructions. To facilitate insertion of the attached pages into the affected enclosures to our letter dated, August 27, 1996, the attached pages have been divided into groups corresponding to the applicable enclosure, and separate remove and insert instructions are provided for each group corresponding to the applicable enclosure, separated by a colored page.

1. Enclosure 6 to Serial RNP-RA/96-0141, "Conversion Package Section 1.0"

- a. Part 2, "Discussion of Changes (DOCs) for CTS Markup"

Remove
Page 5

Insert
Page 5

DISCUSSION OF CHANGES
ITS CHAPTER 1.0 - USE AND APPLICATION

CTS is the requirement to enter appropriate CTS action statements for CTS surveillance tests with out-of-tolerance results. Entry into an action statement requires repair (e.g., adjustment) within a limited time or otherwise comply with the CTS action statement. These are administrative changes which provide additional detail and are consistent with ISTS.

TECHNICAL CHANGES - MORE RESTRICTIVE

- M1 CTS Specification 3.1.4, which defines \bar{E} as the average of beta and gamma energy disintegration of the specific activity is revised in the ITS definition to include weighted average and the composition of isotopes to exclude iodine. Since this change adds requirements to the CTS that are currently found only in procedures, this change is more restrictive, and has no adverse impact on safety.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

SPECIFICATIONS RELOCATED

None