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SUBJECT: Documents transmittal of copies of rev 1 to technical
requirements manual for HB Robinson Steam Electric Plant,
Unit 2. Description & technical justification for change &
instruction for removing & inserting pages also encl.

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Carolina Power & Light Company

Robinson Nuclear Plant
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Hartsville SC 29550

Robinson File No: 13510

Serial: RNP-RA/98-0046

MAR 06 1998

United States Nuclear Regulatory Commission
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**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
TRANSMITTAL OF SELECT COPIES OF
REVISION 1 TO THE TECHNICAL REQUIREMENTS MANUAL**

Sir or Madam

This letter documents the transmittal of copies of Revision 1 to the Technical Requirements Manual (TRM) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

Attachment I provides a description and technical justification for the change.

Attachment II provides copies of Revision 1 to the TRM in accordance with the distribution below and includes instructions for removing and inserting pages.

Should you have any questions regarding this matter, please contact Mr. H. K. Chernoff of my staff.

Very truly yours,

[Signature]
for T. M. Wilkerson
Manager - Regulatory Affairs

1-0071

ADD 1/

ALG/alg

Attachments

- I. Summary of Change to Technical Requirements Manual
- II. Technical Requirements Manual Revision 1



- c: Mr. L. A. Reyes, Regional Administrator, USNRC, Region II (w/o Attachment II)
- Mr. M. B. Shymlock, USNRC Region II
- Mr. J. W. Shea, USNRC Project Manager, HBRSEP (w/3 copies Attachment II)
- USNRC Senior Resident Inspector, HBRSEP (w/o Attachment II)

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
SUMMARY OF CHANGE TO TECHNICAL REQUIREMENTS MANUAL

Purpose of for the Change

The purpose of this change is to clarify the required Frequency for the Technical Requirements Manual (TRM) Test Requirement (TR) 4.4.3, regarding refueling interlocks. This change was approved in accordance with 10 CFR 50.59, which determined that the change did not result in an unreviewed safety question.

Description of Previous Condition

TR 4.4.3 requires a test be performed of the refueling system interlocks for function prior to each refueling shutdown. The refueling interlocks are described in Updated Final Safety Analysis Report (UFSAR) Section 9.1.4.1.2. The requirement for testing the refueling interlocks was relocated from Technical Specifications (TSs) Table 4.1-3 Item 6 to the TRM by Amendment 176 to the operating license. The same amendment redefined refueling from a former definition that encompassed only core alterations and movement of irradiated fuel to the current definition of MODE 6.

The required Frequency of TR 4.4.3 of "Once prior to each refueling shutdown" refers to the old (i.e., pre-Amendment 176) definition of refueling which is equivalent to the current definitions of CORE ALTERATIONS and Movement of Irradiated Fuel. Certain interlocks cannot be tested until the upper internals are removed from the reactor vessel. In particular, the travel interlocks for the bridge and trolley cranes cannot be tested with the internals in place.

Therefore, the required Frequency for TR 4.4.3 was changed to "Once prior to movement of irradiated fuel inside containment at each refueling."

Technical Justification for Change

Certain refueling interlocks cannot be tested until the reactor vessel upper internals are removed. These interlocks are currently tested after the reactor vessel upper internals are removed and prior to movement of irradiated fuel.

The original, i.e., pre-Amendment 176 to TSs, definition of Refueling Operations involved "any operation involving movement of core components when there is fuel in the containment vessel and the pressure vessel head is unbolted and removed." The current TS encompassing refueling operations is MODE 6, "Refueling," which is "one or more reactor vessel head closure bolts less than fully tensioned." Additionally, Amendment 176 to TSs has added the definition of CORE ALTERATION to mean "movement of any fuel, sources, or reactivity control components, within the reactor vessel with the reactor vessel head removed and any fuel in the vessel." The new definition of refueling would, as stated currently in the TRM, require that the fueling interlocks be tested prior to

detensioning reactor vessel head closure bolts, however, the old definition of refueling operations involved only movement of core components, which is similar to the current definition of CORE ALTERATIONS and allowed testing of the refueling interlocks after removal of the upper internals.

Therefore, the new TR Frequency, when applied to the current definitions in TSs, is consistent with the definition of refueling as contained in TSs prior to Amendment 176, and permits testing of refueling interlocks at an appropriate time before they are required to protect against conditions that could lead to a fuel handling accident.

REFERENCE USE

CAROLINA POWER AND LIGHT COMPANY
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 1
PART 2

PLANT PROGRAM PROCEDURE

PLP-100

TECHNICAL REQUIREMENTS MANUAL

REVISION 1

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SELECT

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