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SUBJECT: Forwards response to RAI re TS change request to convert to Improved Standard TSS submitted on 960827.

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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/97-0143

JUN 18 1997

United States Nuclear Regulatory Commission

Attn: Document Control Desk

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

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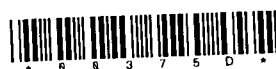
**TRANSMITTAL OF SUPPLEMENT 6 REGARDING THE
TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS**

Gentlemen:

This letter provides Supplement 6 to the Carolina Power & Light (CP&L) Company's H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Improved Technical Specifications (ITS) conversion submittal of August 27, 1996. The purpose of this supplement is discussed below.

A note to Applicability has been added to Limiting Condition For Operations (LCO) 3.3.7, "CREFS Actuation Instrumentation," LCO 3.7.9, "Control Room Emergency Filtration System (CREFS)," LCO 3.7.10, "Control Room Emergency Air Temperature Control (CREATC)," LCO 3.7.11, "Fuel Building Air Cleanup System (FBACS)," LCO 3.8.2, "AC Sources-Shutdown," LCO 3.8.5, "DC Sources-Shutdown," LCO 3.8.8, "AC Instrument Bus Sources-Shutdown," and LCO 3.8.10, "Distribution Systems-Shutdown." The purpose of the note is to clarify that irradiated fuel contained in a spent fuel shipping cask in its full shipping configuration is not applicable to the specification. The requirements are not necessary because irradiated fuel assemblies in the spent fuel cask are protected from damage and any associated release of fission products by the cask and other controls associated with shipments of spent fuel assemblies. The NRC has reviewed and approved the shipments of spent fuel by rail from HBRSEP, Unit No. 2 to the Shearon Harris Nuclear Power Plant near New Hill, North Carolina as documented by NRC letter dated May 24, 1990. The bases were revised accordingly.

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By letter dated April 25, 1997, CP&L identified the need for an additional analysis to determine the necessary Reactor Coolant System (RCS) vent size or charging pump configuration to support operation in MODES 5 and 6 with the reactor vessel head on and allow the capability to fill the accumulators utilizing the Safety Injection (SI) system. Consequently, Attachment IV to that letter, Table 1, "Acceptable Configuration for RCPs, SI Pumps and Charging Pumps," contained "(later)" as the configuration for SI pumps in MODES 5 and 6 with the reactor vessel head on and vented. The results of this calculation and any changes to ITS LCO 3.4.12 were committed to be submitted to the NRC by June 30, 1997.

The resulting required RCS vent size has been determined to be equivalent to two blocked open Power Operated Relief Valves (PORVs). The assumed mass addition was from two (2) safety injection pumps and three (3) charging pumps, and the Residual Heat Removal System was assumed to be in operation and aligned for shutdown cooling. The mass flow rate was determined to be 149.94 lbm/sec and the total mass flow rate capacity of two blocked open PORVs at the Appendix G limit was determined to be 297.88 lbm/sec.

LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," was revised in accordance with an RCS vent size evaluation that permitted two Safety Injection (SI) pumps and three charging pumps to be providing mass addition with the Residual Heat Removal (RHR) system in operation and aligned for shutdown cooling. The required Reactor Coolant System (RCS) vent capacity is 4.4 square inches. This change will provide additional operational flexibility below 200°F. The Bases were revised accordingly. The Bases for the Frequency to Surveillance Requirement (SR) 3.4.12.6 were corrected in the final typed copy of ITS.

Editorial changes were made to the bases to LCOs 3.8.1, 3.8.3, 3.8.4, 3.8.6, 3.8.7, and 3.8.9 to correct title references that were inadvertently not changed in Supplement 5 (i.e., the text "... during movement of irradiated fuel assemblies. . ." was deleted from certain title references).

ITS pages 3.6-11a, 3.6-12, and 3.7-4 are included to correct page numbering errors.

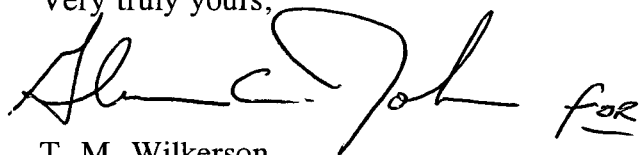
Attachment I provides an affidavit as required by 10 CFR 50.30(b).

Attachment II contains a revised Table 1, "Acceptable Configuration for RCPs, SI Pumps and Charging Pumps," as described above.

Attachment III contains Supplement 6 to the ITS conversion submittal dated August 27, 1996, as modified by letters dated December 18, 1996, January 17, 1997, March 27, 1997, April 6, 1997, April 25, 1997, May 30, 1997, and June 13, 1997. Instructions for insertion of pages into the submittal are included.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,

A handwritten signature in black ink, appearing to read 'T. M. Wilkerson', followed by a small 'for' written in a cursive script.

T. M. Wilkerson
Manager - Regulatory Affairs

ALG/alg
Attachments

- I. Affidavit
 - II. Revised Table 1 To Attachment IV To CP&L Letter RNP-RA/97-0087.
 - III. Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Supplement 5
- c: Mr. M. 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

J. S. Keenan, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/97-0143 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.

John S. Keenan

Sworn to and subscribed before me

this 18th day of June 1997

(Seal) Albert L. Cannon
Notary Public for South Carolina

My commission expires: March 22nd, 2005

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
THE TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

REVISED TABLE 1 TO ATTACHMENT IV TO
CP&L LETTER RNP-RA/97-0087

Table 1, "Acceptable Configuration of RCPs, SI Pumps and Charging Pumps"

	RCPs	SI Pumps	Charging Pumps
MODE 1	3	2	3
MODE 2	3	2	3
MODE 3	3	2	3
MODE 4	3	1	3
MODE 5, RCS $\geq 175^{\circ}\text{F}$, Not Vented¹	3	1	3
MODE 5, RCS $< 175^{\circ}\text{F}$, Not Vented¹	3	0	3
MODE 5, Vessel Vented¹	0	3	3
MODE 6, Vessel Not Vented¹	0	0	3
MODE 6, Vessel Vented¹	0	3	3

¹ The minimum required vent cross sectional area is 4.4 square inches.

United States Nuclear Regulatory Commission
Attachment III to Serial: RNP-RA/97-0143
(161 Pages)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
THE TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

SUPPLEMENT 6