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SUBJECT: Forwards rev to TS basis re defining cold shutdown conditions as applied to bulk RCS coolant.

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SEP 09 1993

Serial: RNP\93-1866
10 CFR 50.90

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
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TECHNICAL SPECIFICATION BASIS CHANGE

Gentlemen:

This letter transmits a revision to the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) Technical Specifications basis to define the cold shutdown conditions as applying to the bulk Reactor Coolant System (RCS) coolant.

The basis portion of Section 3.6.1 of the current HBR2 Technical Specifications states that no steam be present should a Reactor Coolant System leak occur when containment integrity is not in place. This basis change will change the basis to define the cold shutdown conditions as applying to the bulk RCS coolant. This change will allow the pressurizer to be maintained with a steam bubble while containment integrity is relaxed.

Technical Specification 3.6.1 is required to ensure that the release of radioactive materials from the containment atmosphere will be restricted such that radiation doses at the site boundary will remain within the dose guideline values of 10 CFR Part 100. Maintaining the RCS bulk coolant below 200°F provides margin to boiling should a leak occur while the containment system is not operable, thus limiting the potential offsite release of radionuclides. Carolina Power & Light Company (CP&L) has determined that while maintaining Tave ≤200°F and operating the pressurizer with a steam bubble, the intent of the Technical Specification is met and the limitations of 10 CFR Part 100 are assured. This determination allows CP&L to revise the basis of the Technical Specification to describe the purpose for having containment integrity required.

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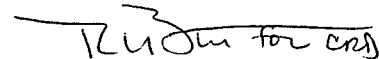
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Operating the pressurizer with a steam bubble is preferable to other operating conditions. The steam bubble mitigates pressure transients caused by pump starts or changes in the heat input to the RCS. This pressure regulation prevents challenges to the Low-Temperature Overpressure Protection system and reactor vessel integrity.

It is concluded from the above information that operating the pressurizer with a steam bubble present and containment integrity relaxed meets the intent of Technical Specification 3.6.1. This operating condition does not present a risk greater than any event reported in Chapter 15 of the UFSAR and any potential exposure would be within the limits of 10 CFR Part 100. The basis for the Technical Specification is being revised to better describe the intent of the Technical Specification.

Please refer any questions regarding this submittal to Mr. J. S. Kozyra at (803) 383-1872.

Very truly yours,



Charles R. Dietz
Vice President
Robinson Nuclear Plant

RES:lst

Enclosure: Revised Basis Pages

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