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 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Application for amend to license DPR-23, requesting change to reduce or eliminate testing of operable EDG inoperable & to permit TS testing of operable EDG w/one EDG inoperable w/o entering condition prohibited by TS.

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10 CFR 50.90

**Carolina Power & Light Company**

Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

RNP File No: 13510HA

Serial: RNP/94-1958

**JAN 29 1995**

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555

**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2**  
**DOCKET NO. 50-261/LICENSE NO. DPR-23**  
**ADDITIONAL INFORMATION WITH RESPECT TO REQUEST FOR CHANGE TO**  
**TECHNICAL SPECIFICATIONS REGARDING INOPERABLE EMERGENCY DIESEL**  
**GENERATOR DURING POWER OPERATION**

Gentlemen:

On July 29, 1994, Carolina Power & Light (CP&L) Company submitted a request for a change to the Technical Specifications (TS), in accordance with 10 CFR 50.90, for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The purpose of the change request was to reduce or eliminate the testing of an operable Emergency Diesel Generator (EDG) when the other EDG is inoperable, and to permit in TS testing of the operable EDG with one EDG inoperable without entering a condition prohibited by TS (i.e., entry into TS Section 3.0). As a result of conversations with the NRC during the review of that submittal, CP&L is now providing additional information to our submittal. The requested TS page changes have been retyped to include the additional information. We have evaluated this additional information and have concluded that the additional information has not altered the basis for concluding in our letter of July 29, 1994, that the requested TS change does not involve a significant hazards consideration nor does an environmental assessment need to be prepared.

The purpose of this additional information is to permit the operable EDG to be tested only once while one EDG is inoperable, and to reduce the scope of testing of the operable EDG, in order to preserve the overall reliability of the EDGs. The TS change request will also permit in TS the testing of the operable EDG with one EDG inoperable without entering a condition prohibited by TS (i.e., entry into TS Section 3.0).

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Fewer tests of the operable EDG are beneficial from a safety standpoint for the following reasons:

- 1) The number of entries into an equipment configuration where a loss of safety function exists during the period of the test is minimized;
- 2) The overall engine degradation (i.e., wear and stress) and the probability of failure due to degradation are reduced; and,
- 3) The susceptibility to damage from an electrical grid fault, while the engine under test is running paralleled to the grid, is reduced.

The requested change to reduce the frequency and scope of testing of the operable EDG reflects the revised NRC position for testing the operable EDG only once as discussed in Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and is consistent with NUREG-1431, "Standardized Technical Specifications Westinghouse Plants."

On June 13, 1994, HBRSEP Licensee Event Report 94-011 was submitted as a result of operation in a condition prohibited by TS. This event occurred because the TS requires daily testing of the operable EDG when one EDG is inoperable. The performance of a surveillance test on the operable EDG renders the EDG inoperable for a total of two hours per test, thus both EDGs are inoperable for that period. The TS prohibits any plant condition with both EDGs inoperable, and TS Section 3.0 must be entered.

The requested change to allow two hours to perform a test on the operable EDG is consistent with TS already approved for the Surry Nuclear Station, Units 1 and 2, by letter dated March 2, 1992.

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

Enclosure 2 provides a detailed description of the requested change and the basis for the change.

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for CP&L's conclusion that the requested change does not involve a significant hazards consideration.

Enclosure 4 provides environmental considerations which demonstrate that the requested change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the change to the TS.

Enclosure 5 provides page change instructions for incorporating the requested change.

Enclosure 6 provides the proposed TS pages.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the requested change to the TS.

In order to allow time for procedure revision and orderly incorporation into copies of the TS, CP&L requests that the requested change, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the change to the TS.

Please refer any questions regarding this submittal to Mr. K. R. Jury at (803) 857-1363.

Yours very truly,



R. M. Krich  
Manager - Regulatory Affairs

Enclosures:

1. Affidavit
2. Basis for Change Request
3. 10 CFR 50.92 Evaluation
4. Environmental Considerations
5. Page Change Instructions
6. Technical Specifications Page

c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)  
Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II  
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP  
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP  
Attorney General (SC)

Enclosure 1  
Affidavit

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter RNP/94-1958 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

Anne H Shepherd

Notary (Seal)

My commission expires: *November 18, 1996*

## ENCLOSURE 2

### H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 NRC DOCKET NO. 50-261/LICENSE NO. DPR-23 ADDITIONAL INFORMATION WITH RESPECT TO REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS REGARDING INOPERABLE EMERGENCY DIESEL GENERATOR DURING POWER OPERATION

#### BASIS FOR CHANGE REQUEST

##### Background

In accordance with 10 CFR 50.90, Carolina Power & Light Company is submitting a request for a change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The purpose of this change is to allow operation of the plant with one Emergency Diesel Generator (EDG) inoperable without entering a condition prohibited by TS. On June 13, 1994, HBRSEP Licensee Event Report 94-011 was submitted as a result of operation in a condition prohibited by TS (i.e., entry into TS Section 3.0). This event occurred because the TS requires daily testing of the operable EDG when one EDG is inoperable. The performance of this surveillance test on the operable EDG renders the EDG inoperable for a total of two hours per test. The TS prohibits any plant condition with both EDGs inoperable, and TS Section 3.0 must be entered. This TS change request includes provisions to permit in TS the operable EDG to be tested only once with one EDG inoperable, in order to preserve the overall reliability of the EDGs.

##### Requested change

TS Section 3.7.2(d) provides for one EDG to remain inoperable for a period of up to seven (7) days provided the operable EDG is tested daily. The current EDG surveillance test involves a pre-lube period, manual start, and manual synchronization of the EDG.

The TS requirement for testing of the operable EDG was based on an earlier NRC position. The intent of the prior position was to provide positive demonstration that a loss of safety function had not occurred. To satisfy the current TS requirement, the operable EDG must be taken out of service to demonstrate operability through supplemental testing. The detrimental effects of the daily testing exceed the benefit derived from any added assurance of operability the test provided. Daily testing results in both an increased probability of equipment failure due to unnecessary wear, and results in a loss of safety function during the period of performance of the test.

Industry operating experience has since demonstrated that daily testing of operable EDGs, when one EDG is inoperable, is not necessary to provide assurance of system operability. Reduced frequency of testing to demonstrate the operability of an otherwise operable EDG has no affect on the design or performance characteristics of the EDG.

To avoid unnecessary wear and tear on the EDG, an alternative to the performance of a daily surveillance test on the operable EDG is requested. Under all conditions, verification is performed of the availability of off-site power within one hour and once every twelve hours thereafter while the inoperable EDG remains inoperable. If it can be determined that the remaining operable EDG is not inoperable due to common cause failure (i.e., the cause for inoperability on one EDG does not exist on the other operable EDG) within 24 hours, the operable EDG is not tested for a period of 72 hours. If the inoperable EDG remains inoperable beyond 72 hours, the operable EDG is tested once in the subsequent 24 hours. Otherwise, the requirements are to demonstrate the operability of the remaining operable EDG by testing the operable EDG within 24 hours. In either case, the operable EDG is not tested again for the duration of the Limiting Condition for Operation (LCO).

To minimize wear on moving parts that do not get lubricated when the engine is not running, the operability tests in the TS Action Statement are modified by a note to indicate that the EDG start may be preceded by an engine pre-lube period. The EDG may be started at a limited starting speed, followed by a warm-up at the lower speed, and then followed by gradual acceleration to synchronous speed. The EDG will be required to achieve steady state voltage and frequency. To allow testing of the operable EDG without entering a condition prohibited by TS prior to the expiration of the required Action Statement time, allowance for a total of two hours to perform the test is included in the TS Action Statement.

#### Basis

Two EDGs have sufficient capacity to start and run at design load all of the Engineered Safety Features(s) (ESF) equipment. The safety features operated from one EDG can adequately cool the core for any Loss-of-Coolant Accident (LOCA).

The requested Action Statements associated with a single EDG being inoperable are intended to provide assurance that a loss of off-site power, during the period that an EDG is inoperable, does not result in a complete loss of the ESF equipment. These features are designed with redundant safety related trains. This includes motor driven auxiliary feedwater pumps. Single train systems, such as turbine driven auxiliary feedwater pumps, are not included. Redundant ESF failures consist of inoperable features associated with a train that is redundant to the train that has the inoperable EDG.

The required source of off-site power is the 115 kV Start-Up Transformer (SUT). The 115 kV SUT receives power from several sources in the 115 kV switchyard as discussed in Section 8.2 of the Updated Final Safety Analysis Report. Currently, no provision exists in TS to verify the required off-site power source when testing the EDGs. The required off-site power source is verified once per twelve hours, corresponding to once per shift. Availability of off-site power sources is confirmed by verifying that each breaker is aligned in its correct position to ensure that distribution buses and loads are connected to their preferred power source. Performance of this action as part of routine shift operations once per twelve hours

is adequate to ensure off-site power availability without causing scheduling difficulties associated with a more frequent verification. This requested change provides additional assurance to minimize the probability of a loss of power during the period of time that an EDG is inoperable.

The requested Action Statements associated with a single EDG being inoperable provide an allowance to avoid unnecessary testing of the operable EDG. All EDG inoperabilities must be investigated for common cause failures regardless of how long the period of time that the EDG is inoperable. The term "common cause failure" means that the cause of the inoperable diesel also exists on the operable diesel. This investigation is performed by evaluation or by testing the operable EDG within the first 24 hours of the LCO.

If it can be determined that the cause of the inoperable EDG does not exist on the operable EDG, testing of the operable EDG is not performed for a period up to 72 hours. If the EDG inoperability lasts as long as 72 hours, the operability of the other operable EDG is verified by a start, within the next 24 hours, of the operable EDG to provide continued assurance of operability. If the inoperable EDG is restored to operability within the subsequent 24 hours (i.e., between 72 hours and 96 hours), and the test of the operable EDG has not yet been performed, the test of the operable EDG need not be performed. TS Section 3.0 is not entered during the period of time that testing of the remaining EDG is being performed, a total of two hours. The purpose of this provision is to avoid entry into TS Section 3.0 solely for the purpose of testing of the remaining EDG. During that time, the EDG being tested cannot start automatically on loss of off-site power; however, the short time necessary to perform this test is acceptable in comparison to the low probability of a LOCA coincident with a loss of off-site power.

If the cause of the initial inoperable EDG cannot be confirmed not to exist on the other operable EDG, verifying a start of the EDG within the first 24 hours of the LCO suffices to provide assurance of continued operability of that EDG. This testing also does not require entry into TS Section 3.0.

The requested Action Statements associated with a single EDG being inoperable requires only one test of the operable EDG in the seven (7) day LCO time period for both of the above conditions.

If it can be determined that the cause of the inoperable EDG exists on the other EDG, the other EDG is declared inoperable upon discovery, and TS Section 3.0 will apply.

To minimize wear on moving parts that do not get lubricated when the engine is not running, the operability tests in the required Action Statements associated with a single EDG being inoperable are modified by a note to indicate that the EDG start may be preceded by an engine pre-lube period. The EDG may be started at a limited starting speed, followed by a warm-up at the lower speed, and then followed by gradual acceleration to synchronous



speed. The EDG may be partially loaded, but loading is not required for operability testing by the required Action Statement. The EDG will be required to achieve steady state voltage and frequency to ensure that the test is successful.

Provision for ensuring that the most limiting LCO applies when a combination of an EDG and other ESF equipment are inoperable is already included in TS Section 1.3, "Definitions." In TS Section 1.3, any ESF equipment on the train that the inoperable EDG exists is declared inoperable immediately when the corresponding redundant equipment on the other train (i.e., supplied by the operable EDG) becomes inoperable.

The requested change to reduce the frequency and scope of testing of the operable EDG reflects the revised NRC position for testing the operable EDG only once as discussed in Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and is consistent with NUREG-1431, "Standardized Technical Specifications Westinghouse Plants."

The requested change to allow two hours to perform a test on the operable EDG is consistent with TS already approved for the Surry Nuclear Station, Units 1 and 2, by letter dated March 2, 1992.

### Conclusions

The intent of the existing TS was to allow operation with one EDG inoperable for a period of seven days and to verify the operability of the other EDG with daily testing. The impact of increased industry-wide emphasis on EDG reliability has resulted in several necessary steps in EDG surveillance testing that were not anticipated when the TS were originally written. These additional steps indeed prevent the EDG from performing its required function automatically in the event that a loss of off-site power should occur. The probability of a loss of off-site power while an EDG is inoperable is minimized by the provision of ensuring that required off-site power is available. The low probability of a loss of off-site power coincident with EDG testing has been accepted as a necessary risk to improved EDG reliability industry-wide as evidenced by Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel generator Reliability," and NUREG-1431. The TS change request incorporates the best industry guidance to allow one EDG to be inoperable without quickly entering a condition prohibited by TS prior to the expiration of the required Action Statement time.

## ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
ADDITIONAL INFORMATION WITH RESPECT TO REQUEST FOR  
CHANGE TO TECHNICAL SPECIFICATIONS REGARDING  
INOPERABLE EMERGENCY DIESEL GENERATOR  
DURING POWER OPERATION

### 10 CFR 50.92 EVALUATION

We have evaluated the additional information provided with this letter and have concluded that the basis has not been altered for concluding in our letter of July 29, 1994, that the requested change to the H. B. Robinson Steam Electric Plant, Unit No. 2 Technical Specifications (TS) to permit in TS the operable Emergency Diesel Generator (EDG) to be tested only once with one EDG inoperable, without entering a condition prohibited by TS, does not involve a Significant Hazards Consideration. In support of this conclusion, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

#### Requested change

TS Section 3.7.2(d) provides for one EDG to remain inoperable for a period of up to seven (7) days provided the operable EDG is tested daily. The current EDG surveillance test involves a pre-lube period, manual start, and manual synchronization of the EDG.

To avoid unnecessary wear and tear on the EDG, an alternative to the performance of a daily surveillance test on the operable EDG is requested. Under all conditions, verification is performed of the availability of off-site power within one hour and once every twelve hours thereafter while the inoperable EDG remains inoperable. If it can be determined that the remaining operable EDG is not inoperable due to common cause failure (i.e., the cause for inoperability on one EDG does not exist on the other operable EDG) within 24 hours, the operable EDG is not tested for a period of 72 hours. If the inoperable EDG remains inoperable beyond 72 hours, the operable EDG is tested once in the subsequent 24 hours. Otherwise, the requirements are to demonstrate the operability of the remaining operable EDG by testing the operable EDG within 24 hours. In either case, the operable EDG is not tested again for the duration of the Limiting Condition for Operation.

To minimize wear on moving parts that do not get lubricated when the engine is not running, the operability tests in the TS Action Statement are modified by a note to indicate that the EDG start may be preceded by an engine pre-lube period. The EDG may be started at a limited starting speed, followed by a warm-up at the lower speed, and then followed by gradual acceleration to synchronous speed. The EDG will be required to achieve steady state voltage and frequency. To allow testing of the operable EDG without entering a condition prohibited by TS prior to the expiration of the required Action Statement time, allowance for a total of two hours to perform the test is included in the TS Action Statement.

Basis

This change request does not involve a significant hazards consideration for the following reasons.

1. The requested change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The requested change involves a change in the testing frequency of the EDGs when one EDG is inoperable, as well as provision of additional measures to ensure that a source of off-site power is available. Since the change involves the EDGs which perform an accident mitigation function and is not involved in any accident initiation sequence, there is no significant increase in the probability of a previously analyzed accident. Since the change involves the EDGs which perform an accident mitigation function, and the change provides additional assurance that emergency power will be available for accident mitigation, there is no significant increase in the consequences of a previously analyzed accident. Therefore, there would be no increase in the probability or consequences of an accident previously evaluated.
2. The requested change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The requested change involves a change in the testing frequency of the EDGs when one EDG is inoperable, as well as provision of additional measures to ensure that a source of off-site power is available. Since the change does not involve changes in the operation of the plant, or physical or equipment changes and involve controls for accident mitigation equipment, the requested change will not create the possibility of new or different kind of accident from any accident previously evaluated. Therefore, the requested change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The requested change does not involve a significant reduction in the margin of safety. The requested change involves a change in the testing frequency of the EDGs when one EDG is inoperable, as well as provision of additional measures to ensure that a source of off-site power is available. The change reduces the required testing frequency of an operable EDG, hence reducing time that no EDG will be available for automatic starting and loading. Verifying that the operable EDG remains operable within 24 hours where common cause for inoperability cannot be confirmed not to exist, and after 72 hours where no common cause for inoperability is established, provides adequate confidence that an EDG will be available to perform its intended function if needed. The change will provide assurance that emergency power will be available to mitigate the effects of any accident and will prevent excessive wear on the EDGs. Therefore, the requested change does not involve a significant reduction in a margin of safety.

Enclosure 3 to RNP/94-1958  
Page 3 of 3

Based on the above significant hazards evaluation, Carolina Power & Light Company has concluded that the requested change does not involve any significant hazards considerations.

## ENCLOSURE 4

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
ADDITIONAL INFORMATION WITH RESPECT TO REQUEST FOR  
CHANGE TO TECHNICAL SPECIFICATIONS REGARDING  
INOPERABLE EMERGENCY DIESEL GENERATOR  
DURING POWER OPERATION

### ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A requested change to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the requested change would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site; or (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has evaluated the additional information provided with this letter and has concluded that the additional information has not altered the basis for concluding in our letter of July 29, 1994, that the requested change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the change to the Technical Specifications (TS). The basis for this conclusion follows.

#### Requested change

TS Section 3.7.2(d) provides for one Emergency Diesel Generator (EDG) to remain inoperable for a period of up to seven (7) days provided the operable EDG is tested daily. The current EDG surveillance test involves a pre-lube period, manual start, and manual synchronization of the EDG.

To avoid unnecessary wear and tear on the EDG, an alternative to the performance of a daily surveillance test on the operable EDG is requested. Under all conditions, verification is performed of the availability of off-site power within one hour and once every twelve hours thereafter while the inoperable EDG remains inoperable. If it can be determined that the remaining operable EDG is not inoperable due to common cause failure (i.e., the cause for inoperability on one EDG does not exist on the other operable EDG) within 24 hours, the operable EDG is not tested for a period of 72 hours. If the inoperable EDG remains inoperable beyond 72 hours, the operable EDG is tested once in the subsequent 24 hours. Otherwise, the requirements are to demonstrate the operability of the remaining operable EDG by testing the operable EDG within 24 hours. In either case, the operable EDG is not tested again for the duration of the Limiting Condition for Operation.

To minimize wear on moving parts that do not get lubricated when the engine is not running, the operability tests in the TS Action Statement are modified by a note to indicate that the EDG start may be preceded by an engine pre-lube period. The EDG may be started at a limited starting speed, followed by a warm-up at the lower speed, and then followed by gradual acceleration to synchronous speed. The EDG will be required to achieve steady state voltage and frequency. To allow testing of the operable EDG without entering a condition prohibited by TS prior to the expiration of the required Action Statement time, allowance for a total of two hours to perform the test is included in the TS Action Statement.

#### Basis

The requested change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons.

1. As demonstrated in Enclosure 3, the requested change does not involve a significant hazards consideration.
2. The requested change does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site. The requested change involves a change in the testing frequency of the EDGs when one EDG is inoperable, as well as provision of additional measures to ensure that a source of off-site power is available. The requested change does not involve: (1) radiological effluents or effluent release limits, (2) system operation or the ability to respond to operational transients, or (3) changes to radiological effluents or dose rates from plant systems or equipment. As such, the change can not affect the types or amounts of any effluents that may be released off-site.
3. The requested change does not result in an increase in individual or cumulative occupational radiation exposure. The requested change involves a change in the testing frequency of the EDGs when one EDG is inoperable, as well as provision of additional measures to ensure that a source of off-site power is available. The EDGs are located in the Auxiliary Building inside of the Radiation Control Area. Sources of radiological exposure or contamination are not normally present in the area where the EDGs are tested. The actual frequency of testing of the EDGs could be decreased as a result of this TS Change. Therefore, the change has no affect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 5

H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
ADDITIONAL INFORMATION WITH RESPECT TO REQUEST FOR  
CHANGE TO TECHNICAL SPECIFICATIONS REGARDING  
INOPERABLE EMERGENCY DIESEL GENERATOR  
DURING POWER OPERATION

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