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KRICH, R.M. Carolina Power & Light Co.
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SUBJECT: Application for amend to license DPR-23, modifying TS
3.10.1.3 to provide for temporary conditions in which full
length control rod insertion limits exceeded due to
automatic plant responses or conservative operator actions.

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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/95-0099

SEP 11 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
REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
REGARDING FULL LENGTH CONTROL ROD INSERTION LIMITS

Gentlemen:

In accordance with 10 CFR 50.90, Carolina Power & Light Company is submitting a request for change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed TS change modifies a Limiting Condition for Operation (LCO) to provide for temporary conditions in which the Full Length Control Rod Insertion Limits (RILs) are exceeded due to automatic plant responses or conservative operator actions. The proposed TS change is comparable to similar requirements in NUREG-1431, the improved "Standard Technical Specifications - Westinghouse Plants," Revision 1, April 1995.

The proposed TS change is submitted to fulfill a commitment made in Licensee Event Report Number 93-013, dated September 13, 1993.

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

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

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for our conclusion that the proposed change does not involve a significant hazards consideration.

Enclosure 4 provides environmental considerations which demonstrate that the proposed 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), we proposed that no environmental assessment needs to be prepared in connection with the issuance of the proposed change to the TS.

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

Enclosure 6 provides the proposed TS pages.

In accordance with 10 CFR 50.91(b), we are providing the State of South Carolina with a copy of the proposed change to the TS.

In order to allow time for procedure revision and orderly incorporation into copies of the TS, we request 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. A. L. Garrou at (803) 857-1544.

Very truly yours,



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 Pages

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)

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 RNP-RA/95-0099 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.

CS Hinnant

Sworn to and subscribed before me

this 11th day of September 19 95

(Seal) - Albert L. Garrou

Notary Public for South Carolina

My commission expires: March 22, 2005

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BASIS FOR CHANGE REQUEST

Proposed Change

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 proposed change is to modify a Limiting Condition for Operation (LCO), TS Section 3.10.1.3, to provide for temporary conditions in which the Full Length Control Rod Insertion Limits (RILs) are exceeded due to automatic plant responses or conservative operator actions. The proposed TS change is comparable to similar requirements in NUREG-1431, the improved "Standard Technical Specifications - Westinghouse Plants," Revision 1, April 1995.

The proposed change to TS is also submitted to fulfill a commitment made in HBRSEP, Unit No. 2 Licensee Event Report Number 93-013, dated September 13, 1993. On August 14, 1993, the RILs were briefly exceeded following a turbine runback. This resulted in a reportable event since TS Section 3.10.1.3 allows for exceeding the RILs for physics tests and full length control rod exercises only.

The proposed change adds an allowance for RILs to be exceeded for a time no greater than the time criteria established by the axial power distribution methodology or one (1) hour, whichever is sooner. An action is added for the reactor to be placed in the hot shutdown condition within six (6) hours if compliance with the RILs cannot be restored within the specified time period. A proposed revision to the Bases for TS Section 3.10.1.3 includes the justification for exceeding the RILs briefly, and this proposed change is technically comparable to the corresponding Bases in NUREG-1431, Revision 1.

Basis

As stated in the Objective to TS Section 3.10, "Required Shutdown Margins, Control Rod, and Power Distribution Limits," the purpose of RILs is to ensure (1) core subcriticality after a reactor trip and during normal shutdown conditions, (2) limited potential reactivity insertions from a hypothetical control rod ejection, and (3) an acceptable core power distribution during power operation.

It is possible for the RILs to be exceeded briefly as a consequence of automatic plant responses or conservative operator actions. Operation with the RILs exceeded is acceptable for a brief period of time in order to allow for conservative operator action to restore compliance with the RILs. Operation remains acceptable during this brief period of time because of the low probability of a simultaneous occurrence of an independent accident.

Specifically, the proposed change to TS establishes the time period wherein the RILs can be exceeded within the time criteria established by the axial power distribution methodology, or within one (1) hour, whichever is sooner. This time period is more restrictive than the comparable time period of two (2) hours in NUREG-1431, Revision 1, TS Section 3.1.7, "Control Bank Insertion Limits." The one hour time period is chosen to equal the one hour time period provided in HBRSEP, Unit No. 2 TS Section 3.10.2.7.a to restore the indicated axial flux difference to its target band to ensure acceptable total core power peaking factor.

The option provided in NUREG-1431, Revision 1, TS Section 3.1.7 for performing a formal reactivity balance determination (i.e., verification of the shutdown margin) is not included in the proposed change to TS. Restoration of compliance with the RILs within one hour, or within the time criteria established by the axial power distribution methodology, re-establishes the required shutdown margin.

The proposed change to TS also includes a required action if compliance with the RILs cannot be restored within the time requirement. The required action consists of placing the reactor in the hot shutdown condition within 6 hours utilizing normal operating procedures. The required action and completion time are comparable to the corresponding action in NUREG-1431, Revision 1, TS Section 3.1.7 and are consistent with the text of similar requirements in other HBRSEP, Unit No. 2 TS Sections.

Compliance with the RILs is assumed as an initial condition for most of the bounding events analyzed in Chapter 15 of the HBRSEP, Unit No. 2 Updated Final Safety Analysis Report (UFSAR). RIL compliance for relevant events analyzed in Chapter 15 of the UFSAR assists in maintaining required shutdown margin, limiting potential reactivity insertions, and maintaining acceptable core power distributions. The proposed change to TS that allows exceeding the RILs for up to the time limit established by the axial power distribution methodology, or one hour, is acceptable because the Chapter 15 events either occur independently of temporarily exceeding the RILs, or bound the consequences of exceeding the RILs. For those Chapter 15 events that occur independently of temporarily exceeding the RILs, the probability of such an event occurring during the brief allowed period for the RILs to be exceeded is low.

The allowance for RILs to be exceeded in NUREG-1431, Revision 1, TS Section 3.1.7 is justified on a similar basis as evidenced by the associated Bases in NUREG 1431, Revision 1. Accordingly, the proposed TS change includes modifications to the Bases for TS Section 3.10.1.3 that are comparable to the corresponding NUREG-1431, Revision 1, TS Section 3.1.7 Bases.

Conclusion

The proposed change to TS Section 3.10.1.3 to provide for temporary conditions in which the RILs may be exceeded due to automatic plant responses or conservative operator actions is acceptable because during this brief period of time the simultaneous occurrence of an independent accident has a low probability. The proposed TS change is comparable to similar requirements described in NUREG-1431, Revision 1.

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10 CFR 50.92 EVALUATION

We have concluded that the proposed change to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Technical Specifications (TS), to provide for temporary conditions in which the Full Length Control Rod Insertion Limits (RILs) are exceeded due to automatic plant responses or conservative operator actions, 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.

Proposed Change

The proposed change revises TS Section 3.10.1.3 by adding an allowance for RILs to be exceeded within the time criteria established by the axial power distribution methodology, or one (1) hour, whichever is sooner. An action is added for the reactor to be placed in the hot shutdown condition within six (6) hours if compliance with the RILs cannot be restored within the specified time period. A proposed change to Bases for TS Section 3.10.1.3 includes the justification for briefly exceeding RILs because analyzed accidents either have a low probability of occurring while RILs are being temporarily exceeded, or bound the consequences of exceeding the RILs.

Basis

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

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change adds an allowance for RILs to be exceeded for a maximum of one (1) hour. The proposed change does not involve the addition or modification of plant equipment, nor does it alter the design, material, or operation of plant systems. No analyzed accidents are initiated by an entire control rod bank exceeding the RILs, due to automatic plant responses or conservative operator actions. The overall performance of the Reactor Control System, Power Distribution Control procedures, and Control Rod Drive System is not degraded. There is no increase in fatigue or number of operational cycles of equipment, and there is no change in system interfaces. The consequences of previously evaluated accidents are not increased since exceeding the RILs for a limited period is acceptable as the probability of a simultaneous occurrence of an independent accident is low. Therefore, an allowance for RILs to be exceeded for a maximum of one (1) hour does not affect the probability of occurrence or consequences of an analyzed accident.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change adds an allowance for RILs to be exceeded for a maximum of one (1) hour. The proposed change does not involve the addition or modification of plant equipment, nor does it alter the design or operation of plant systems. The only procedural changes required will be those associated with recovery from the infrequent condition of exceeding the RILs. No new accident scenarios are introduced when the RILs are exceeded for a short period of time due to automatic plant responses or conservative operator actions because the probability of a simultaneous occurrence of an independent accident is low. Therefore, an allowance for RILs to be exceeded for a maximum of one (1) hour does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed change does not involve a significant reduction in the margin of safety. The proposed change adds an allowance for RILs to be exceeded for a maximum of one (1) hour. The proposed change does not involve the addition or modification of plant equipment, nor does it alter the design or operation of plant systems. The overall performance of the Reactor Control System, Power Distribution Control, and Control Rod Drive System is not degraded. There is no increase in fatigue or number of operational cycles of equipment, and there is no change in system interfaces. When the RILs are exceeded for a limited time period, due to automatic plant responses or conservative operator actions, the margin of safety is not reduced because the probability of a simultaneous occurrence of an independent accident is acceptably low. Therefore, an allowance for RILs to be exceeded for a maximum of one (1) hour does not involve a significant reduction in a margin of safety.

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

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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 change to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the 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 reviewed this proposed change to the Technical Specifications (TS) and concluded that the proposed 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 an amendment to the TS that reflects the proposed change. The basis for this conclusion follows.

Proposed Change

The proposed change revises TS Section 3.10.1.3. The proposed change adds an allowance for Full Length Control Rod Insertion Limits (RILs) to be exceeded within the time criteria established by the axial power distribution methodology, or one (1) hour, whichever is sooner. An action is added for the reactor to be placed in the hot shutdown condition within six (6) hours if compliance with the RILs cannot be restored within the specified time period. A proposed change to the Bases for TS Section 3.10.1.3 includes the justification for exceeding briefly of RILs because analyzed accidents either have a low probability of occurring while the RILs are being temporarily exceeded, or bound the consequences of exceeding the RILs.

Basis

Operation of H. B. Robinson Steam Electric Plant, Unit No. 2 in accordance with the proposed 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, "10 CFR 50.92 Evaluation," the proposed change does not involve a significant hazards consideration.
2. Implementation of the proposed 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 proposed change adds an allowance for RILs to be exceeded for a maximum of one hour. The proposed 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, implementation of the proposed change can not affect the types or amounts of any effluents that may be released off-site.

3. Implementation of the proposed change does not result in an increase in individual or cumulative occupational radiation exposure. The requested change adds an allowance for RILs to be exceeded for a maximum of one hour. No operation of the plant involving the accumulation of occupational dose by individuals is affected by the proposed change. Therefore, implementation of the proposed change has no affect on either individual or cumulative occupational radiation exposure.

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PAGE CHANGE INSTRUCTIONS

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3.10-11	3.10-11
3.10-15	3.10-15