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SUBJECT: Application for amend to license DPR-23, upgrading RTS, ESFAS  
 & isolation function TS to more closely agree w/NUREG-0452,  
 Rev 3, "STS for Westinghouse Pressurized Water Reactors,"  
 dtd Fall 1981.

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**CP&L****Carolina Power & Light Company**

Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

Robinson File No.: 13510HA

Serial: RNP-RA/95-0214

**DEC 10 1995**

United States Nuclear Regulatory Commission

Attn: 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 TECHNICAL SPECIFICATIONS CHANGE  
REACTOR TRIP AND ENGINEERED SAFETY FEATURE  
ACTUATION SYSTEMS INSTRUMENTATION

Gentlemen:

In accordance with 10 CFR 50.90, we are submitting a request for a change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

The current TS Section 3.5.1 and Tables 3.5-2, 3, and 4 describe the limiting condition during which Reactor Trip System (RTS), Engineered Safety Feature Actuation System (ESFAS), and Isolation Function instrumentation may be inoperable. The TS section requires that when the number of channels of a particular subsystem in service falls below the limits given in the table columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy" cannot be achieved, operation shall be limited according to the requirement shown in column 3 of the tables.

The proposed change will upgrade the RTS, ESFAS, and Isolation Function TS to more closely agree with NUREG-0452, Revision 3, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," dated Fall 1981. The proposed change will make editorial enhancements, will delineate discrete actions to be taken whenever an instrument channel becomes inoperable, and will add an "Applicable Conditions" column that defines the applicability and/or mode of operation of each Functional Unit. Currently, the TS Tables 3.5-2, 3, and 4 do not specify discrete operator actions whenever an instrument channel becomes inoperable and lack clarity of the applicability for each Functional Unit.

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 change.

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

Enclosure 4 provides an environmental evaluation that demonstrates 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), 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 proposed change.

Enclosure 6 provides the proposed TS page.

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 proposed change, once approved by the NRC, be issued such that implementation will occur within 90 days of issuance of the amendment to the TS.

Please refer any questions regarding this submittal to me at (803) 857-1802.

Very truly yours,



R. M. Krich  
Manager - Regulatory Affairs

DTG/klb

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)

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/95-0214 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

Sworn to and subscribed before me

this 10<sup>th</sup> day of Dec. 1995

(Seal)

David Clark

Notary Public for South Carolina

My commission expires: 3/21/2005

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
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INSTRUMENTATION

BASIS FOR CHANGE REQUEST

Proposed Change

The current Technical Specifications (TS) Section 3.5.1 and Tables 3.5-2, 3, and 4 describe the limiting condition during which Reactor Trip System (RTS), Engineered Safety Feature Actuation System (ESFAS), and Isolation Function instrumentation may be inoperable. The TS section requires that when the number of channels of a particular subsystem in service falls below the limits given in the table columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy" cannot be achieved, operation shall be limited according to the requirement shown in column 3 of the tables.

The proposed change will upgrade the RTS, ESFAS, and Isolation Function TS sections to more closely agree with NUREG-0452, Revision 3, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," dated Fall 1981. The proposed change will make editorial enhancements, will delineate discrete actions whenever an instrument channel becomes inoperable, and will add "Applicable Conditions" column that defines the applicability and/or mode of operation of each Functional Unit. Currently, the tables do not specify discrete operator actions whenever an instrument channel becomes inoperable and lack clarity of the applicability for each Functional Unit.

Basis

The operational safety instrumentation has been provided to sense accident conditions and to automatically initiate operation of the Engineered Safety Features in the event that principle process variable limits are exceeded. Reactor safety is provided by the RTS, which automatically initiates appropriate action to prevent exceeding established limits. During plant operations, the complete instrumentation systems will normally be in service.

The purpose of the proposed change is, to provide specific operator actions whenever an instrument channel becomes inoperable, to clarify the applicability of each Functional Unit, to clarify the required functions associated with each Functional Unit, and to make editorial enhancements to improve the usability of TS Tables 3.5-2, 3, and 4.

The "custom" TS at H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 were implemented prior to the development and issuance of NUREG-0452, Revision 3, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," dated Fall 1981. As such, many of the operator actions specified in NUREG-0452 were not contained in the HBRSEP, Unit No. 2 "custom" TS. Over the years, the lack of specificity has resulted in inconsistent application and enforcement of the TS.

The proposed changes are consistent with the intent of the Westinghouse Standard TS (i.e., NUREG-0452). Further, these changes have been shown to be acceptable based on industry practice and are consistent with the design of HBRSEP, Unit No. 2. These changes will improve clarity, promote consistent interpretation, and result in a net improvement in the overall safety of the plant by providing specific action to be taken in the event of equipment failure. Equipment restoration, testing, and bi-stable trip times are more restrictive requirements, which will increase the overall safety of the plant.

#### Conclusion

The wording used in TS Section 3.5.1 and Tables 3.5-2, 3, and 4 is in an obsolete format that at times imposes an unnecessary operational restriction that has no safety basis. The proposed change will upgrade the RTS, ESFAS, and Isolation Function TS to more closely agree with NUREG-0452, Revision 3, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," dated Fall 1981.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
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INSTRUMENTATION

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) regarding the Reactor Trip and Engineered Safety Feature Actuation systems does not involve a significant hazards consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

Proposed Change

The current TS Section 3.5.1 and Tables 3.5-2, 3, and 4 describe the limiting condition during which Reactor Trip System (RTS), Engineered Safety Feature Actuation System (ESFAS), and Isolation Function instrumentation may be inoperable. The TS section requires that when the number of channels of a particular subsystem in service falls below the limits given in the table columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy" cannot be achieved, operation shall be limited according to the requirement shown in column 3 of the tables.

The proposed change will upgrade the RTS, ESFAS, and Isolation Function TS to more closely agree with NUREG-0452, Revision 3, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," dated Fall 1981. The proposed change will make editorial enhancements, will delineate discrete actions whenever an instrument channel becomes inoperable, and will add "Applicable Conditions" column that defines the applicability and/or mode of operation of each Functional Unit. Currently, the tables do not specify discrete operator actions whenever an instrument channel becomes inoperable and lack clarity of the applicability for each Functional Unit.

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 to upgrade the RTS and ESFAS TS to more closely agree with Westinghouse Standard TS (i.e., NUREG-0452) will not result in any hardware changes. The RTS and ESFAS are not assumed to be initiators of analyzed events.

The role of these systems is in mitigating and thereby limiting the consequences of accidents. The proposed changes will ensure the RTS and ESFAS remain capable of mitigating design basis events as described in the Updated Final Safety Analysis Report (UFSAR) and that the results of the analyses in the UFSAR remain bounding. Additionally, the proposed changes do not impose any new safety analyses limits or alter the plant's ability to detect and mitigate events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 to upgrade the RTS and ESFAS TS to more closely agree with Westinghouse Standard TS (i.e., NUREG-0452) does not necessitate a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, the proposed change 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, which upgrades the RTS and ESFAS TS to be consistent with Westinghouse Standard TS (i.e., NUREG-0452) does not involve a significant reduction in a margin of safety. The proposed change has been developed to ensure the analyzed safety limits are not exceeded and ensures the RTS and ESFAS are available when necessary to mitigate the consequences of accidents. It also imposes additional requirements to ensure the RTS and ESFAS remain capable of mitigating the consequences of design basis accidents as described in the UFSAR accident analyses. In addition, this change provides a benefit of avoiding unnecessary plant transients when adequate compensatory measures are available to ensure the intended function of the instrumentation is satisfied.

#### Conclusion

Based on the above significant hazards evaluation, we have concluded that the proposed change does not involve a significant hazards consideration.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
REACTOR TRIP AND ENGINEERED SAFETY FEATURE ACTUATION SYSTEMS  
INSTRUMENTATION

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; (3) result in an increase in individual or cumulative occupational radiation exposure. We have reviewed this request and determined 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 amendment. The basis for this determination follows.

Proposed Change

The current Technical Specifications (TS) Section 3.5.1 and Tables 3.5-2, 3, and 4 describe the limiting condition during which Reactor Trip System (RTS), Engineered Safety Feature Actuation System (ESFAS), and Isolation Function instrumentation may be inoperable. The TS section requires that when the number of channels of a particular subsystem in service falls below the limits given in the table columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy" cannot be achieved, operation shall be limited according to the requirement shown in column 3 of the tables.

The proposed change will upgrade the RTS, ESFAS, and Isolation Function TS to more closely agree with NUREG-0452, Revision 3, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," dated Fall 1981. The proposed change will make editorial enhancements, will delineate discrete actions whenever an instrument channel becomes inoperable, and will add "Applicable Conditions" column that defines the applicability and/or mode of operation of each Functional Unit. Currently, the tables do not specify discrete operator actions whenever an instrument channel becomes inoperable and lack clarity of the applicability for each Functional Unit.

Basis

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, the proposed change does not involve a significant hazards consideration.
2. 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 to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 TS in order to upgrade the RTS and ESFAS TS to more closely agree with NUREG-0452. The proposed change ensures the RTS and ESFAS remain capable of mitigating accidents as assumed in the safety analyses. Therefore, no significant change exists in the types or amounts of any effluents released from the site.

3. The proposed change does not result in an increase in individual or cumulative occupational radiation exposure.

The proposed change is being made to HBRSEP, Unit No. 2 TS in order to upgrade the RTS and ESFAS TS to more closely agree with NUREG-0452. Since the proposed amendment to TS does not physically change the plant, this change does not involve a change in individual or cumulative occupational exposure.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
REACTOR TRIP AND ENGINEERED SAFETY FEATURE ACTUATION SYSTEMS  
INSTRUMENTATION

PAGE CHANGE INSTRUCTIONS

<u>Removed Page</u>	<u>Inserted Page</u>
3.5-1	3.5-1
Table 3.5-2	Table 3.5-2
Table 3.5-3	Table 3.5-3
Table 3.5-4	Table 3.5-4

United States Nuclear Regulatory Commission

Enclosure 6 to Serial: RNP-RA/95-0214

Page 1 of 1

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
REACTOR TRIP AND ENGINEERED SAFETY FEATURE ACTUATION SYSTEMS  
INSTRUMENTATION

TECHNICAL SPECIFICATIONS PAGES