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ACCESSION NBR: 9604080149      DOC. DATE: 96/03/29      NOTARIZED: YES      DOCKET #  
FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co.      05000261  
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SUBJECT: Application for amend to license DPR-23, adding allowance to complete missed TS requirement surveillance within 24 h of discovery of missed surveillance, per GL 87-09.

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**Carolina Power & Light Company**

Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

**MAR 29 1996**

RNP File No: 13510HA  
Serial: RNP-RA/96-0074

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  
CLARIFICATION OF SURVEILLANCE REQUIREMENTS

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 proposed change adds an allowance to complete a missed Technical Specifications (TS) requirement surveillance within 24 hours of discovery of the missed surveillance in accordance with the guidance of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," as well as provides a correction to a typographical error in the basis and provides certain changes to the wording of surveillance "interval" requirements to adopt more up-to-date and consistent wording.

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

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

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

Enclosure 4 provides an environmental evaluation which demonstrates that the proposed changes meet 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 proposed changes to the TS.

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

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Highway 101 and SC 23 Hartsville SC

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United States Nuclear Regulatory Commission

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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 changes to the TS.

In order to allow time for procedure revisions and orderly incorporation into copies of the TS, we request that the proposed changes, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

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

Very truly yours,



R. M. Krich  
Manager - Regulatory Affairs

JSK/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 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 96-0074 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 29th day of March 19 96

(Seal)

Albert L. Garro

Notary Public for South Carolina

My commission expires: March 22nd 2005

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
CLARIFICATION OF SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

Proposed Change

The proposed change adds an allowance to complete a missed Technical Specifications (TS) surveillance requirement within 24 hours of discovery of the missed surveillance in accordance with the guidance of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," as well as provides a correction to a typographical error in the Bases and provides certain changes to the wording of surveillance requirements to adopt more up-to-date and consistent wording. The following list provides a description of the current wording of the Technical Specifications (TS) Sections affected by the proposed change.

1. No TS Section exists that provides the allowance of an additional 24 hours to the surveillance interval when a TS surveillance is missed.
2. No TS Section (i.e., proposed TS Section 4.0.1(e.)) exists that explicitly provides for application of the provisions of TS Section 4.0 (i.e., surveillance intervals may be adjusted by 25% to accommodate normal test schedules) to Inservice Inspection (ISI) surveillances.
3. TS Section 4.0 Basis incorrectly states, "It is intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages."
4. TS Section 4.5.1.6 states, "Each fan cooler unit shall be tested at intervals not to exceed one month to verify proper operation of all essential features including valves, dampers and piping."

TS Section 4.8.1 states, "Each motor driven auxiliary pump will be started at intervals not to exceed one month, run for 15 minutes, and determined that it is operable."

TS Section 4.8.2 states, "The steam turbine driven auxiliary feedwater pump by using motor operated steam admission valves will be started at intervals not to exceed one month, run 15 minutes, and determined that it is operable when the reactor coolant system is above the cold shutdown condition. When periods of reactor cold shutdown extend this interval beyond one month, the test shall be performed immediately following reactor heatup."

TS Section 4.8.3 states, "The auxiliary feedwater pumps discharge valves will be tested by operator action at intervals not greater than one month."

TS Section 4.16.2.A states, "Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six months."

The following describes the proposed changes to the affected TS sections.

- 1a. Add the following paragraphs to TS Section 4.0 for allowance of additional 24 hours to complete missed surveillance test(s).

"If it is discovered that a Surveillance Requirement, as defined by Specification 4.0 and 4.0.1(e.), was not performed within its specified frequency, then compliance with the requirement to declare that the Technical Specifications requirements are not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, then the Technical Specifications requirements must immediately be declared not met, and the applicable action requirements must be undertaken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Technical Specifications requirements must be immediately declared not met and the applicable action requirements must be undertaken."

- 1.b Add the following paragraphs to TS Section 4.0 Basis for allowance of additional 24 hours to complete missed surveillance test(s).

"Specification 4.0 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specification 4.0 and 4.0.1(e.), and not at the time that the specified frequency was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

The basis for the delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0 allows the full delay period of 24 hours to perform the surveillance.

Failure to comply with specified frequencies for surveillances is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the surveillance within the delay period allowed by this specification, or within the completion time of the actions, restores compliance with respect to operability of the component or system."

2. Add TS Section 4.0.1(e.) for application of TS Section 4.0 (i.e., to ISI surveillances) as follows.

"The provisions of Specification 4.0 are applicable to the above required frequencies for performing inservice inspection and testing activities."

3. Correct typographical error in TS Section 4.0 Basis:

Delete fourth sentence of TS Section 4.0 Basis: "It is intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages."

Add Paragraph two: "The provisions of Specifications 4.0 and 4.0.1(e.) are not intended to be used repeatedly merely as an operational convenience to extend surveillance intervals or periodic completion time intervals beyond those specified."

4. Change surveillance intervals of TS Sections 4.5.1.6, 4.8.1, 4.8.2, 4.8.3, and 4.16.2.A by deleting the wording: "not to exceed" or "not greater than." Replace TS Sections 4.5.1.6, 4.8.1, 4.8.2, and 4.8.3 wording with: "monthly intervals" and TS Section 4.16.2.A wording with "semi-annual intervals." Delete TS Section 4.8.2 wording: "immediately," and "reactor," and replace with: "within 24 hours of achieving stable plant conditions at  $\geq 1000$  psig in the steam generator following plant heatup."

Replace TS Section 4.5.1.6 wording with:

"Each fan cooler unit shall be tested at monthly intervals to verify proper operation of all essential features including valves, dampers and piping."

Replace TS Section 4.8.1 wording with:

"Each motor driven auxiliary pump will be started at monthly intervals, run for 15 minutes, and determined that it is operable."

Replace TS Section 4.8.2 wording with:

"The steam turbine driven auxiliary feedwater pump by using motor operated steam admission valves will be started at monthly intervals, run 15 minutes, and determined that it is operable when the reactor coolant system is above the cold shutdown condition. When periods of reactor cold shutdown extend this interval beyond one month, the test shall be performed within 24 hours of achieving stable plant conditions at  $\geq 1000$  psig in the steam generator following plant heat up."

Replace TS Section 4.8.3 wording with:

"The auxiliary feedwater pumps discharge valves will be tested by operator action at monthly intervals."

Replace TS Section 4.16.2A wording with:

"Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at semi-annual intervals."

Basis for the Proposed Changes

1. TS Section 4.0

GL 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," (i.e., NUREG 0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," (STS) Revision 4, Fall 1981) provides guidance for an improvement to a TS problem as identified by both the NRC and the Atomic Industrial Forum. As a solution to unnecessary shutdowns or plant transients caused when surveillance intervals are inadvertently exceeded, the NRC concluded that 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the action requirements are less than this time limit or when shutdown action requirements apply.

The time limit is based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. Consistent with the NRC's position stated in GL 87-09, a 24 hour delay is proposed as an acceptable time limit for completing a missed surveillance when the allowable outage times of the action requirements are less than this time limit or when shutdown requirements apply. The 24 hour time limit balances the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed.

In addition, we also interpret that failure to perform surveillances within the specified time interval constitutes a failure to meet operability requirements. Therefore, if a surveillance requirement is not met as a result of a failure to schedule the performance of the surveillance, it becomes necessary to enter the action requirements provided in the TS for the affected equipment, as when a surveillance verifies that a system or component is inoperable.

Although a missed surveillance would generally be completed in less time than the allowed 24 hour time limit, special circumstances may require additional time to ensure that the surveillance can be conducted in a safe manner. The time limit of action requirements for surveillances should start when it is identified that the surveillance requirements have not been performed. When the 24 hour delay is allowed, the time limits of the action requirements are applicable either at the end of the 24 hour limit if the surveillance has not been completed or at the time the surveillance is performed if the system or component is found to be inoperable.

NUREG-1431, Revision 1, "Standard Technical Specifications - Westinghouse Plants," April 1995 (i.e., Improved STS) incorporated the NRC's GL 87-09 guidance. This change is an adoption of Improved STS into the HBRSEP, Unit No. 2 TS. However, the current effort to adopt the Improved STS will result in further changes to this section including elimination of the wording of TS Section 4.0.1.a.

2. TS Section 4.0 Basis

TS Section 4.0 Basis contains an inadvertent typographical error that was introduced during TS Amendment No. 137. The error is a word omission that changes the meaning of the sentence to read opposite of the intent of GL 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals," dated August 21, 1989. This omission was an oversight.

3. TS Section 4.0.1(e.)

Addition of TS Section 4.0.1(e.) will clarify that TS Section 4.0 applies to the ISI surveillance test intervals. Amendment No. 137 to the HBRSEP, Unit No. 2 TS incorporated GL 89-14 guidance that removed the 3.25 surveillance interval limit (i.e., "old" HBRSEP, Unit No. 2 TS Section 4.01 c.) from TS Section 4.0.1. The NRC approved this TS change and provided Safety Evaluation (SE), dated December 10, 1991. The SE stated that there were provisions within the HBRSEP, Unit No. 2 TS that allows a surveillance interval to be extended by 25% of the specified time interval. The NRC explicitly implied that the additional 25% of surveillance interval applies to ISI surveillance tests. In addition, both STS and Improved STS have specific specifications that allow the application of 25% of surveillance interval to TS and ISI surveillance tests. The proposed addition of TS Section 4.0.1(e.) incorporates specific guidance for ISI surveillance intervals consistent with NRC SE, dated December 10, 1991, STS (i.e., NUREG-0452), and Improved STS (i.e., NUREG-1431).

4a. TS Sections 4.5.1.6, 4.8.1, 4.8.2, 4.8.3, and 4.16.2.A

Revision No.1 to the HBRSEP, Unit No. 2 Final Facility Description and Safety Analysis Report (FFDSAR) TS section added TS Sections 4.5.1.6, 4.8.1, and 4.8.2. No basis was provided that justified the specific wording used (i.e., "not to exceed" or "not greater than") for these surveillance intervals. No basis information was conveyed during the Atomic Energy Commission (AEC) and Carolina Power & Light Company TS Meeting held on February 19, 1970. TS Section 4.8.3 is a first draft specification and was not added by revision 1 to the TS.

In the original TS issued by the AEC, several other HBRSEP, Unit No. 2 FFDSAR TS Sections concerning surveillances for Safety Injection, Residual Heat Removal, and Containment Spray pumps, Spray Additive and Boron Injection tank isolation valves also contained restrictive surveillance interval statements (i.e., "not to exceed"). Amendment No. 83 deleted these specifications (i.e., "old" TS Sections 4.5.2.1, and 4.5.2.3) by removing detailed ISI requirements from the TS and replacing them with the requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (i.e., addition of TS Section 4.0.1). The NRC SE dated September 10, 1984, stated, "This change includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice examination and testing activities."

The Improved STS does not contain surveillance interval restrictions of this nature. The Improved STS has a 25% of surveillance interval allowance for TS (i.e., TS Section 4.0.2) and ISI (i.e., TS Section 4.0.5(c.)) surveillance test intervals. HBRSEP, Unit No. 2 TS Section 4.0 has always stated that "specified intervals may be adjusted plus or minus 25% to accommodate normal test schedules."

Amendment No. 137 was a result of a TS change request in response to GL 89-14. This amendment allowed removal of "old" TS Section 4.0.1(c.) requirement (i.e., for ISI surveillances) that limited the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. The NRC SE, dated December 10, 1991, stated that there were provisions within HBRSEP, Unit No. 2 TS that allows a surveillance interval to be extended by 25% of the specified time interval (i.e., TS Section 4.0).

The NRC allows licensees an extension to surveillance intervals in order to provide flexibility for scheduling the performance of surveillances in order to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Furthermore, the NRC considers that extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. Therefore, deletion of the restrictive wording (i.e., "not to exceed" and "not greater than") from TS is consistent with the NRC's surveillance interval position as documented in the SEs, dated September 10, 1984, and December 10, 1991, and is consistent with the Improved STS.

4b. TS Section 4.16.2.A (continued)

Amendment No. 50 added TS Section 4.16.2.A, but did not provide a detailed basis for why the specific surveillance interval wording was used. The addition of this surveillance requirement was addressed by the NRC in the SE, dated September 30, 1980, upon issuance of the amendment.

The sealed source license requirements are contained in HBRSEP, Unit No. 2 Operating License (OL). The requirements of 10 CFR 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," apply to sealed sources as required by the OL. There are no surveillance requirement interval limits in 10 CFR 30.

Therefore, because TS Section 4.0 (i.e., allows surveillance intervals to be adjusted by plus or minus 25%) applies to TS Section 4 surveillances, as intended by the NRC, TS Section 4.16.2.A. interval will be revised to read consistent with all other TS Section 4 surveillances. Any exception to this rule will have specific disallowances stated in the applicable specification.

4c. TS Section 4.8.2 (continued)

Defining "immediately" as it applies to TS Section 4.8.2, for testing the "Steam Turbine Driven Auxiliary Feedwater (SDAFW) pump" operable after plant heat up is necessary in order to justify revising the specification. NUREG-1431 does not require the SDAFW pump to be tested following plant heat up until "24 hours after greater than or equal to 1000 psig in the steam generator." The basis for the deferral of performing testing is to allow for suitable test conditions to be established. NUREG-1431 states, "The deferral is required because there is insufficient steam pressure to perform the test." Because of the insufficient steam supply available, the motor driven auxiliary feedwater pumps meet the requirement until testing of the SDAFW pump is performed at the minimum conditions, thereby providing the sufficient/required protection.

Conclusion

The proposed changes result in an acceptable level of safety.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
CLARIFICATION OF SURVEILLANCE REQUIREMENTS

10 CFR 50.92 EVALUATION

We have concluded that the proposed changes to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) to add an allowance to complete an missed surveillance within 24 hours of discovery of the missed surveillance in accordance with the guidance of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," as well as to provide a correction to a typographical error in the TS Basis, and to provide certain changes to the wording of surveillance requirements to adopt more up-to-date and consistent wording does not involve a significant hazards consideration. In support of this determination, an evaluation of each of the three standards set forth in 10 CFR 50.92 is provided below.

Requested Change

The proposed changes add an allowance to complete an missed surveillance within 24 hours of discovery of the missed surveillance in accordance with the guidance of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," as well as provides a correction to a typographical error, and provides certain changes to the wording of surveillance requirements to adopt more up-to-date in the TS Basis and consistent wording.

Basis

The proposed changes do not involve a significant hazards consideration for the following reasons.

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes clarify and incorporates NRC guidance for application of extending or moving surveillance intervals by plus or minus 25%, by elimination of restrictive surveillance interval descriptions that conflict with NRC guidance, by allowing for an additional 24 hours to perform missed surveillances, and by providing a defined finite period for the term "immediate" for Technical Specification (TS) and Inservice Inspection (ISI) surveillances. The basis for extending or moving surveillances, as stated in GL 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance

Intervals," is to provide plants flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Extending surveillance intervals during plant operation can result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the scheduled surveillance. NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," states "the 25% extension does not significantly degrade the reliability that results from performing the surveillance at its specified frequency." This is based on the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. The basis for the 24 hour delay period, as stated in the basis for NUREG-1431, includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements." The basis for defining the term "immediate" is to provide guidance to plant personnel for conducting operability testing of the Steam Driven Auxiliary Feedwater pump after extended shutdown periods in order to minimize plant risks and not pose an unsafe operational transient during an unstable plant configuration (i.e., during plant startup). Since these changes do not affect plant design, operation, or the manner in which testing is performed, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes clarify and incorporates NRC guidance for application of extending or moving surveillance intervals by plus or minus 25%, by elimination of restrictive surveillance interval descriptions that conflict with NRC guidance, by allowing for an additional 24 hours to perform missed surveillances, and by providing a defined finite period for the term "immediate" for TS and ISI surveillances. Since these changes do not affect plant design, operation, or the manner in which testing is performed, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in the margin of safety.

The changes proposed, with the exception of allowing an additional 24 hours to complete missed surveillances, are to clarify existing surveillance intervals and to provide more specific and detailed criteria without changing current surveillance scheduling methodologies. The NRC has determined that allowing an additional 24 hours to complete missed surveillance tests minimizes additional challenges to plant operations such that there is a conservative balance between the risk associated with performing the surveillance during stable plant conditions and the risk of imposing a plant transient due to TS action statements or changing "modes" of operation. These extensions are current industry practices endorsed by the NRC which provide flexibility for scheduling and performing surveillances and permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at either the specified time interval or inadvertently missing the surveillance interval. The risk to safety is low in contrast to the alternatives; therefore, the proposed changes do not involve a significant reduction in the margin of safety.

#### Conclusion

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
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REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
CLARIFICATION OF SURVEILLANCE REQUIREMENTS

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 proposed change to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed 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 proposed changes meet 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 proposed changes add an allowance to complete an missed surveillance within 24 hours of discovery of the missed surveillance in accordance with the guidance of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," as well as provides a correction to a typographical error in TS Bases, and provides certain changes to the wording of surveillance requirements to adopt more up-to-date and consistent wording.

Basis

The proposed changes meet 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 changes do not involve a significant hazards consideration.
2. The proposed changes do 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 changes clarify TS and ISI surveillance intervals requirements; therefore, can not affect the types or amounts of any effluents released from the site.

3. The proposed changes do not result in an increase in individual or cumulative occupational radiation exposure.

The proposed changes do not alter or affect the nature, frequency, or type of surveillances performed. Since the proposed TS amendment does not change the method or frequency of surveillance tests, this change does not involve a change in individual or cumulative occupational exposure.

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PAGE CHANGE INSTRUCTIONS

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