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SUBJECT: Informs of re-transmittal of 970613 cover ltr, responding to
RAI re TS change request to convert to improved STS.

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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/97-0142

JUN 16 1997

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
RE-TRANSMITTAL OF COVER LETTER TO
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
AND TRANSMITTAL OF SUPPLEMENT 5 REGARDING THE
TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

Gentlemen:


By letter issued June 13, 1997, Carolina Power & Light (CP&L) Company submitted responses to the NRC request for additional information (RAI) dated May 22, 1997, regarding the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Improved Technical Specifications (ITS) conversion submittal of August 27, 1996. The cover letter (i.e., Serial: RNP-RA/97-0142) included Supplement 5 to that submittal as an attachment. The letter was signed on June 13, 1997. The cover letter was inadvertently mailed without the date of the letter stamped on the cover page.

A copy of the cover letter with the date stamped correctly is included as an attachment.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,



for 
T. M. Wilkerson
Manager - Regulatory Affairs

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United States Nuclear Regulatory Commission

Serial: RNP-RA/97-0142

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Attachment

c: Mr. M. K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
Mr. B. B. Desai, USNRC Resident Inspector, HBRSEP
Attorney General (SC) (w/out Enclosures)
Lockheed Idaho Technology, Inc.

United States Nuclear Regulatory Commission

Attachment to Serial: RNP-RA/97-0142

5 pages

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
RE-TRANSMITTAL OF COVER LETTER TO
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
AND TRANSMITTAL OF SUPPLEMENT 5 REGARDING THE
TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA

Serial: RNP-RA/97-0133

JUN 13 1997

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
AND TRANSMITTAL OF SUPPLEMENT 5 REGARDING THE
TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS**

Gentlemen:

This letter provides Carolina Power & Light (CP&L) Company responses to the NRC request for additional information (RAI) dated May 22, 1997, regarding the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Improved Technical Specifications (ITS) conversion submittal of August 27, 1996. The responses pertain to ITS Sections 3.0, "Limiting Condition for Operation (LCO) Applicability," 3.1, "Reactivity Control Systems," 3.2, "Power Distribution Limits," 3.5, "Emergency Core Cooling Systems (ECCS)," and 3.9, "Refueling Operations." In order to support the NRC review schedule for this submittal, the NRC has requested that the response to their request be submitted within 30 days of receipt of their letter (i.e., July 2, 1997). However, to support the NRC development of a draft Safety Evaluation Report, these responses are being provided to the NRC by June 13, 1997.

Attachment I provides an affidavit as required by 10 CFR 50.30(b).

The response to the NRC's request for additional information is provided as Attachments II through VI to this letter. The responses are provided in table format similar to the question format provided in the NRC letter dated May 22, 1997.

By letter dated March 27, 1997, CP&L informed the NRC that a discrepancy had been identified with regard to the basis for the ITS requirement to maintain 21 feet of water above the spent fuel in the Spent Fuel Pit. The evaluation of that discrepancy has not resulted in the need to change the proposed ITS limit of 21 feet for the spent fuel pit water level. The response to NRC

Question 3.7.12-1 has been revised and is included as Attachment VII to this letter. Additional information regarding this issue will be provided to the NRC by separate letter.

Attachment VIII contains an update to Enclosure 4 to CP&L letter dated August 27, 1997, which identifies where relocated current Technical Specifications (CTS) requirements will be located upon ITS implementation. This information was revised in response to NRC requests for additional information and the development of revisions to the Technical Requirements Manual, Core Operating Limits Report (COLR), Quality Assurance Program Description, Offsite Dose Calculation Manual (ODCM) for ITS implementation, and modifications to the submittal in current and past supplements to relocate information into the ITS bases.

Attachment IX contains Supplement 5 to the ITS conversion submittal dated August 27, 1996, as modified by letters dated December 18, 1996, January 17, 1997, March 27, 1997, April 6, 1997, April 25, 1997, and May 30, 1997. Supplement 5 contains submittal pages which have been revised in response to the NRC's requests for additional information. The supplement includes instructions for insertion of pages into the submittal. It also contains changes to the submittal described below.

The bases to LCO 3.1.6, "Control Bank Insertion Limits," LCO 3.2.3, "Axial Flux Difference (AFD)," LCO 3.4.3, "RCS P/T Limits," LCO 3.4.11, "Pressurizer PORVs," LCO 3.4.14, "RCS PIVs," LCO 3.4.16, "RCS Specific Activity," LCO 3.5.3, "ECCS-Shutdown," LCO 3.6.1, "Containment," LCO 3.6.3, "Containment Isolation Valves," LCO 3.6.6, "Containment Spray and Cooling System" LCO 3.8.9, "Distribution Systems-Operating," were revised to include requirements relocated from the Current Technical Specifications (CTS) that are not retained in ITS to the bases.

The bases to LCO 3.2.1, " $F_Q(Z)$," were revised to include requirements relocated from the CTS that are not retained in ITS to the bases. Also, the bases to SR 3.2.1.1 were corrected to reference the top and bottom 10% of the core that is excluded from evaluation.

The notes to Table 3.3.2-1 were resequenced.

LCO 3.3.3, "PAM Instrumentation," was revised to require only a Trip Actuation Device Operations Test for primary Power Operated Relief Valve (PORV) position, PORV block valve position, and primary safety valve position, based on the current licensing basis. Verification of setpoint is not required. The bases were revised accordingly.

LCO 3.3.4, "Remote Shutdown System," was revised to add SR 3.3.4.4 from NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, because no other SR verified OPERABILITY of the function. The bases were revised accordingly.

In an SR to LCO 3.5.2, "ECCS-Operating," the bases to LCO 3.6.6, "Containment Spray and Cooling Systems," and an SR LCO 3.7.4, "AFW System," a note was added. The note clarifies testing methods which may be used to determine operability of the pumps. These

methods are in accordance with the provisions of the American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel (B&PV) Code. The bases were revised accordingly.

A note was added to SR 3.6.3.2 in LCO 3.6.3, "Containment Isolation Valves" to permit non-performance of verification of valve position for Penetration Pressurization System valves of small size. Justification for the change is provided in the supplement. The bases were revised accordingly.

LCO 3.7.1, "MSSVs," was revised to take into account a recent NRC Information Notice that questioned the assumptions behind the allowable THERMAL POWER levels in the event that MSSV(s) were inoperable. In particular, previous Westinghouse analyses did not take into account the effect of a positive Moderator Temperature Coefficient (MTC). A calculation has been performed in accordance with Westinghouse recommendations and the LCO was revised consistent with the results. The bases were revised in accordance with the LCO.

In CP&L letter dated May 30, 1997, CP&L stated that the acceptance criteria for SR 3.8.1.8 in LCO 3.8.1, "AC Sources-Operating," were still being evaluated. The evaluation has been completed and the only supportable acceptance criterion for SR 3.8.1.8 is that the diesel generator not trip on overspeed. Accordingly, the acceptance criteria for SR 3.8.1.8 were revised to require only that the diesel generator not trip on overspeed. No other acceptance criteria were justifiable. The bases were revised accordingly.

In LCO 3.8.6, "Battery Cell Parameters," the required electrolyte temperature for the "A" battery was revised to 67°F in response to an evaluation of design information that the justification for 55°F calculation was a one time only evaluation. The bases were revised accordingly.

SR 3.8.4.1 in LCO 3.8.4, "DC Sources - Operating," and bases are revised to reflect the voltage associated with a single battery cell jumpered out. This change is consistent with the current licensing basis which does not specify the battery float voltage requirement. Also the bases to LCO 3.8.4 were revised to reflect that the minimum battery voltage output of 2.13 volts per cell and total output of 128 volts is not discussed in the UFSAR.

LCO 3.8.8, "AC Instrument Bus Sources-Shutdown," was revised to reflect the current practice of aligning certain instrument buses to a non-emergency bus powered from offsite and the dedicated shutdown diesel generator. The bases were revised accordingly.

LCO 3.9.7, "Containment Purge Filter System," was added including ACTIONS and SRs to maintain CTS requirements and assumptions regarding a fuel handling accident inside containment in the Updated Final Safety Analysis Report. The bases were added accordingly.

ITS Section 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program," was revised to reflect relocation of CTS requirements to the Inservice Inspection Program.


A correction to the CTS markup page for ITS Section 5.5.13, "Diesel Fuel Oil Testing Program," to add information relating to the program is included in Attachment VIII along with a discussion of the change.

In a telephone conversation with the NRC on June 2, 1997, CP&L discussed the methodology for selecting the Appendix G limits utilized in the LTOP analyses. The limits were taken by interpolating between the steady state curve and the 60°F heatup and cooldown curves to find the most limiting data point for the temperature range permitted by the heatup and cooldown procedure. The Appendix G limits from the heatup curve were most limiting and were used in the analyses.

NRC Question 3.1.6-2 requests additional justification for the acceptability of extending the allowed outage time for control rod bank insertion limits from one (1) hour to two (2) hours. CP&L has found that the extension of the allowed outage time from the current licensing basis to two hours is not justified. A supplement to the submittal to revise the ITS allowed outage time to be consistent with the current licensing basis (i.e., one hour) will be provided to the NRC by July 31, 1997.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,


for T. M. Wilkerson
Manager - Regulatory Affairs

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Attachments

- I. Affidavit
- II. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.0, "Limiting Condition for Operation (LCO) Applicability"
- III. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.1, "Reactivity Control Systems"
- IV. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.2, "Power Distribution Limits,"

- V. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.5, "Emergency Core Cooling Systems (ECCS)"
- VI. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.9, "Refueling Operations"
- VII. Revised Response to NRC Question 3.7.12-1
- VIII. Matrix of Relocated Technical Specifications (TS) Requirements and Detailed TS Requirements
- IX. Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Supplement 5

c: Mr. M. K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
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