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SUBJECT: Application for amend to license DPR-23, revising TS Section  
 4.4 re penetration pressurization sys. Present changes  
 clarify that leakage testing is performed in accordance w/  
 containment leakage rate testing program.

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**Carolina Power & Light Company**

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Robinson File No.: 13510

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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**  
**CHANGES TO THE TECHNICAL SPECIFICATIONS BASES**

Gentlemen:

The purpose of this letter is to transmit the attached changes to the Bases of the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS), section 4.4 regarding the Penetration Pressurization System (PPS). The change to the Bases was reviewed by the Plant Nuclear Safety Committee on August 13, 1997.

These changes are a result of a modification at HBRSEP which isolated the PPS. The PPS is a secondary system which pressurizes certain containment penetrations between the inner and outer containment boundaries with air at a slightly higher pressure than the peak containment pressure that would result from a design basis accident. Although not required, past practice had been to use the PPS as a continuous leakage monitoring system for penetrations served by the system. Excessive leakage from the system was alarmed in the Control Room. The PPS is not credited for accident mitigation in the Updated Final Safety Analysis Report analyses.

Related changes to the TS Bases were provided to the NRC by Carolina Power & Light (CP&L) Company letter dated July 28, 1995. The present changes clarify that leakage testing is performed in accordance with the Containment Leakage Rate Testing Program, required by TS section 6.12, and remove reference to the Control Room alarm function. The PPS remains capable of providing continuous or periodic monitoring of leakage from potential leakage paths, as discussed in the TS Bases.

Marked-up and re-typed Basis pages are provided as Attachments I and II, respectively.

Attch.

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If you have any questions concerning this matter, you may contact me or  
Mr. H. K. Chernoff of my staff.

Very truly yours,



T. M. Wilkerson  
Manager - Regulatory Affairs

JSK/jk

Attachments I: Marked-up Basis Pages

II: Re-typed Basis Pages

c: Mr. B. B. Desai, USNRC Senior Resident Inspector, HBRSEP  
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