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SUBJECT: Provides description of procedural changes that will be made subsequent to approval of requested changes to TS.

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**Carolina Power & Light Company**

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**SEP 11 1998**

United States Nuclear Regulatory Commission

Attn: Document Control Desk

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

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**SUPPLEMENTAL COMMITMENT IN SUPPORT OF  
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE  
REFUELING OPERATIONS - NUCLEAR INSTRUMENTATION**

Sir or Madam:

This letter provides a description of procedural changes that will be made subsequent to approval of a requested change to the Technical Specifications (TSs) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. This proposed change was submitted by letter dated March 6, 1998. The requested change allows use of a Post Accident Monitoring (PAM) source range neutron flux detector as a compensatory measure in the event that one of the two required BF3 neutron flux detectors become inoperable during MODE 6.

Subsequent to approval of the proposed change to TSs, Carolina Power & Light (CP&L) Company will revise procedures to describe the transition to the use of a PAM source range instrumentation channel. In the event that a BF3 neutron flux detector fails, procedures will allow the use of available baseline data obtained from logs, strip charts or computer data to evaluate the PAM source range instrumentation channel indications during subsequent fuel movement activities. If baseline data has not been previously obtained from the PAM source range instrumentation channel, then the procedure will require that the remaining BF3 channel is checked to be stable, that baseline data for the PAM channel be established, and that the newly obtained baseline data be used to evaluate the PAM data obtained during subsequent fuel movement activities. The procedure changes will be made effective prior to implementation of the approved change to TSs.

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

Very truly yours,



T. M. Wilkerson

Manager - Regulatory Affairs

ALG/alg

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