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SUBJECT: Forwards revs to OL,TS,TS Bases & associated lists of effective pages,incorporating amends 184,185 to OL & TS & revs 9 through 12 of TS Bases.Replacement pages collated with superceded pages removed to facilitate insertion.

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

TRANSMITTAL OF COPIES OF RECENT AMENDMENTS TO
THE OPERATING LICENSE AND TECHNICAL SPECIFICATIONS
AND REVISIONS TO THE TECHNICAL SPECIFICATIONS BASES

Ladies and Gentlemen:

This letter transmits copies of revisions to the Operating License (OL), Technical Specifications (TS), TS Bases, and associated Lists of Effective Pages (LEPs) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The attached copies incorporate Amendments No. 184 and 185 to the OL and TS, and Revisions 9 through 12 to the TS Bases. The replacement pages have been collated with superceded pages removed to facilitate insertion into the distributed notebooks. Amendment No. 184 revised the Required Actions for Limiting Condition for Operation (LCO) 3.7.8, "Ultimate Heat Sink (UHS)," and was implemented on August 26, 1999. Amendment No. 185 added two approved methodologies to TS Section 5.6.5, "Core Operating Limits Report (COLR)," and was implemented on September 7, 1999. Revision 9 to the TS Bases represents changes associated with Amendment No. 184. Revisions 10, 11, and 12 to the Bases were implemented on August 27, 1999, September 2, 1999, and September 15, 1999, respectively. Revisions 10, 11, and 12 of the TS Bases are described in Attachment I.

Attachment II provides collated revisions to the LEP for the OL and TS, the facility OL, the TS, the LEP for the TS Bases, and the TS Bases, and includes instructions for removing and inserting the pages on the cover page.

One copy is provided for Mr. B. R. Bonser at NRC Region II, one copy is provided for the NRC Resident Inspector, and three copies are provided for Mr. R. Subbaratnam at NRC Headquarters. The recipients are requested to remove and insert pages in accordance with the instructions provided.

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If you have any questions on this subject, please contact Mr. H. K. Chernoff.

Sincerely,

for R. L. Warden
Manager - Regulatory Affairs

ALG/alg
Attachments

I. Summary of Changes to Technical Specifications Bases in Revisions 10, 11, and 12
II. Instructions for Removal and Insertion of Pages to the Lists of Effective Pages, Operating License, Technical Specifications, and Bases

c: L. A. Reyes, NRC, Region II (w/o attachment)
B. R. Bonser, NRC, Region II
R. Subbaratnam, NRC, NRR (3 copies attachment)
NRC Resident Inspector, HBRSEP

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

SUMMARY OF CHANGES TO TECHNICAL
SPECIFICATIONS BASES IN REVISIONS 10, 11, AND 12

Description of Each Change and Technical Justification

REVISION 10

Bases to Limiting Condition for Operation (LCO) 3.6.4, "Containment Pressure"

The Bases Background stated that the containment analysis shows that the maximum peak calculated containment pressure, P_a, results from the limiting Steam Line Break (SLB). The statement is incorrect in that P_a is derived from the containment response analysis from a Loss-of-Coolant Accident (LOCA). The leakage rate associated with P_a is a basic assumption for the offsite dose consequences analysis for a LOCA. In a LOCA, the radioactive source term originates inside containment and the dose analysis assumes the maximum allowable containment leakage as the principle source of offsite dose. In a SLB, the source term is significantly lower, and the dose consequences are not bounding.

The Bases statement has been corrected to state, "the containment analysis confirms that this calculated peak containment pressure from the limiting LOCA is the same as the P_a determined in accordance with 10 CFR 50, Appendix J, Option B." The revised statement is in accordance with 10 CFR 50, Appendix J, Option B, which applies to the integrated leakage of Containment. The initial pressure assumption for the containment peak pressure response to a LOCA was corrected to 15 psia (0.3 psig).

Bases to LCO 3.8.4, "DC Sources - Operating"

The Background of the Bases to LCO 3.8.4, "DC Sources - Operating" stated that "Each battery has adequate storage capacity to carry the required load continuously for at least 1 hour (Ref. 1)." The reference (i.e., H. B. Robinson Steam Electric Plant (HBRSEP) Design Criteria) is in error. The one hour battery capacity is not mentioned in the HBRSEP Design Criteria. The reference from which the one hour battery capacity is based is in Updated Final Safety Analysis Report (UFSAR) Section 8.3.2. UFSAR Section 8.3.2 states that the one hour capacity rating is to be applied following a plant trip and a loss of all alternating current (AC) power.

The Bases Background has been revised to state, "Each battery has adequate storage capacity to carry the required load continuously for at least 1 hour following a plant trip and a loss of all AC power (Ref. 2)."

REVISION 11

Bases to LCO 3.5.2, "Emergency Core Cooling System (ECCS) Operating"

The original Technical Specifications (TS) requirements for the valves listed in the Surveillance Requirements of this LCO allowed the control power or air to be restored to the valves for maintenance and testing purposes. With the conversion to improved TS, the LCO was revised to allow inoperability by train rather than by component. In so doing, the additional requirement that 100% of the flow equivalent to a single OPERABLE train be available was added to assure that inoperability of shared components of the inoperable train did not result in less than a fully OPERABLE remaining train. The bases to the LCO were included as part of the improved TS conversion generically without further consideration of specific valve configurations.

The TS requirements to maintain certain valves in the required position with control power or air secured from the valve operators are intended to prevent a hot short or "smart fire" from causing the valves to change position at a time when the ECCS is required. Valve FCV-605 must be secured in the required position to prevent runout of the Residual Heat Removal (RHR) pumps in the ECCS mode. If the ECCS were in a configuration that runout of the RHR pumps could occur, both trains of ECCS would be inoperable simultaneously and LCO 3.0.3 would be required to be entered. Since the runout condition can be prevented by an alternative manual valve configuration, Valve FCV-605 may be taken out of the required position when the alternative manual configuration is used. In this case the plant would be in LCO 3.5.2 Conditions A and B simultaneously.

The Bases to ACTIONS B.1 and B.2 were revised to add, "The flow path to FCV-605 may be isolated in lieu of FCV-605 being in the required position."

REVISION 12

Bases to LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation

The Regulatory Guide (RG) 1.97 submittal, dated December 31, 1984, states that the wide range Resistance Temperature Detectors (RTDs) located on Reactor Coolant System (RCS) cold leg loops A, B, and C (i.e., TE-410, TE-420, and TE-430, respectively) are Category 1 variables. Revision 5 to that submittal, dated September 16, 1999, corrected the commitment for the RCS Loop A cold leg RTD (i.e., TE-410) to Category 3, and an exception to the power redundancy commitment to the variable was taken.

Further evaluation of this variable has found that for the design basis accident events in which the control room operator is required to rely upon instrumentation to manually control actions to accomplish safety functions, power redundancy for the RCS Cold Leg wide range temperature instrumentation is not required. In particular, the RCS Cold Leg wide range temperature instrumentation is relied upon as backup/verification to the core exit temperature instrumentation for indication of core cooling. Additionally, means to determine cold leg temperatures also exist

in the event that the RCS Cold Leg wide range temperature instrumentation is not available. Therefore, the Category, redundancy and power commitments for the RCS Cold Leg wide range temperature instrumentation have been changed in the Bases Revision. The revision also corrects references and the alphanumeric designation of "Category I" to "Category 1," to agree with RG 1.97.