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 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
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SUBJECT: Clarifies proposal re operability requirements for reactor trip breakers.

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**Carolina Power & Light Company**

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A. B CUTTER  
Vice President  
Nuclear Services Department

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
SUPPLEMENTAL REQUEST FOR LICENSE AMENDMENT FOR  
REACTOR TRIP BREAKER DESIGN MODIFICATIONS (GENERIC LETTER 85-09)

Gentlemen:

By letter dated October 3, 1988, Carolina Power & Light Company (CP&L) supplemented its January 12, 1987 request for a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2), proposing operability requirements for reactor trip breakers. In addition, a proposal regarding the operability of the non-trip features of these breakers was included.

During a February 6, 1989 conference call, NRC:

- a) requested clarification regarding wording of the action statement for diverse trip features and
- b) questioned the intent of addressing the non-trip features of the breakers.

Ensuing discussion concluded that clarification of the action statement regarding diverse trip features would eliminate the potential for confusion. Also, specifically addressing non-trip features in TS is not necessary because the status of the breakers is governed by the operability definition in the TS.

This supplement clarifies that action statement and deletes the non-trip features from the previous submittal.

Since this submittal only clarifies a previous request and does not change any margin of safety, the Significant Hazards Analysis previously submitted remains valid.

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- Should you have any questions concerning this matter, please contact Mr. L. I. Loflin at (919) 546-6242.

Yours very truly,

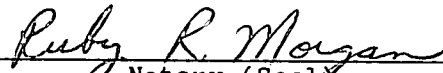
  
A. B. Cutter

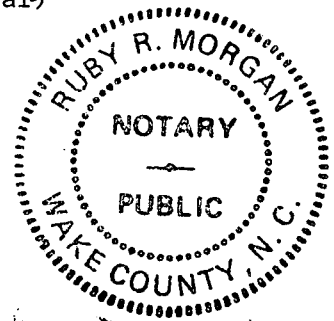
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cc: Mr. S. D. Ebnetter  
Mr. L. Garner (NRC - HBR)  
Mr. R. Lo

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein 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.

My commission expires: 11/27/89

  
Notary (Seal)



#### 3.10.4 Rod Drop Time

- 3.10.4.1 The drop time of each control rod shall be not greater than 1.8 seconds at full flow and operating temperature from the beginning of rod motion to dashpot entry.

#### 3.10.5 Reactor Trip Breakers

- 3.10.5.1 The reactor shall not be made critical unless the following conditions are met:

- a. Two reactor trip breakers are operable.
- b. Reactor trip bypass breakers are racked out or removed.
- c. Two trains of automatic trip logic are operable.

- 3.10.5.2 During power operation, the requirements of 3.10.5.1 may be modified to allow the following components to be inoperable. If the system is not restored to meet the requirements of 3.10.5.1, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures within the next 8 hours.

- a. One reactor trip breaker may be inoperable for up to 12 hours.
- b. One train of automatic trip logic may be inoperable for up to 12 hours.
- c. One reactor trip bypass breaker may be racked in and closed for up to 12 hours.

- 3.10.5.3 With one of the diverse trip features inoperable (shunt trip attachment/undervoltage trip attachment) on one of the reactor trip breakers, power operation may continue for up to 48 hours. If the

diverse trip feature is not restored to operable status within this time, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures within the next eight hours.

3.10.6 Inoperable Control Rods

- 3.10.6.1 A control rod shall be deemed inoperable if (a) the rod is misaligned by more than 15 inches with its bank, (b) if the rod cannot be moved by its drive mechanism, or (c) if its rod drop time is not met.