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AUTH.NAME AUTHOR AFFILIATION
UTLEY,E.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: Requests amend to DPR-23,consisting of Tech Specs changes re residual heat removal sys.

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Carolina Power & Light Company

September 26, 1980

FILE: NG-3514(R)

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Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
United States Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT - RESIDUAL HEAT REMOVAL SYSTEM

Dear Mr. Varga:

In accordance with the Code of Federal Regulation, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) submits for approval the attached changes to the H. B. Robinson Unit No. 2 Technical Specifications. The changes are indicated by vertical lines in the right-hand margin of the affected pages. In accordance with 10CFR170.22, we have determined that this revision constitutes a Class II Amendment because it has been requested and reviewed for safety significance by the NRC. Accordingly, our check for $1,200 is enclosed.

This amendment is being forwarded as requested by NRC letters dated June 11, 1980, and August 15, 1980, to resolve concerns involving residual heat removal system operability during cold shutdown conditions and the minimum refueling cavity water level required during refueling operations. In addition, the change to page 3.3-2 (step h) is submitted to allow use of a plant modification which will eliminate operator actions outside of the control room to restore power to the affected valves while precluding single failures that could result in loss of cooling capability during a loss of coolant accident. The modification is being installed per a previous CP&L commitment to the NRC as documented on page 4 of the safety evaluation by the Office of Nuclear Reactor Regulation supporting Amendment Number 13 to the H. B. Robinson Steam Electric Plant, Unit No. 2, Operating License. The changes were combined in one submittal since the concerns affected the same sections of the H. B. Robinson Unit No. 2 Technical Specifications.

During your review of these changes, be aware that power operation with less than all three reactor coolant loops in operation had already been prohibited by an earlier revision to the Robinson Technical Specifications. The affected page was revised only to be consistent with the remainder of the Technical Specifications. Also, because H. B. Robinson does not have Standard Technical Specifications, the format had to be significantly adjusted to fit the Robinson Technical Specifications. The suggested surveillance requirements

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in the Standard Technical Specifications were purposely omitted because they do not conform with the format of the Robinson Technical Specifications and are considered routine operator functions which have been and will continue to be controlled and documented at the H. B. Robinson Plant through such administrative methods as Operator's Logs, Checklists, Shift Turnover Checklists, Operating Work Procedures, etc.

Per your request, an appropriate safety analysis has been included for each change as a revision to the basis for each affected section.

The Robinson Plant has, for some time, observed the cold shutdown residual heat removal system operability requirements (except the reporting requirements) proposed by this Technical Specification change including administrative controls and appropriate documentation.

A revision to the controls governing minimum refueling cavity water level to meet the requirements of this Technical Specification change will be made prior to the next refueling. The administrative controls governing the breaker positions for the valves listed in Specification 3.3.1.1.h will remain as committed to under Amendment 13 to the H. B. Robinson, Unit No. 2, Operating License until this Technical Specification change is approved and the Plant modification is installed.

If you have any questions on these changes, please contact our staff.

Yours very truly,

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

JHE/JFB/dk
Attachment

cc: J. D. Neighbors (NRC)
T. M. Novak (NRC)
J. P. O'Reilly (NRC - I&E, Region II)

Sworn to and subscribed before me this 26th day of September, 1980.

Franklin Murray
Notary Public

My commission expires: October 4, 1981