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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME: AUTHOR AFFILIATION
 UTLEY, E. E. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Forwards request for license amend incorporating TMI Lessons
 Learned Category A items, Forwards proposed Tech Spec
 revisions & Class III amend fee, Fee submitted under protest.

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November 5, 1980

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File: NG-3514(R)

Serial No.: NO-80-1653

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
CATEGORY "A" LESSONS LEARNED ITEMS

Dear Mr. Varga:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications for its H. B. Robinson Steam Electric Plant (HBR) Unit No. 2.

The attached revisions to the Technical Specifications for HBR Unit No. 2 implement the changes requested by D. G. Eisenhower's letter of July 2, 1980, concerning Category "A" Lessons Learned items. Although CP&L does not agree with the finding of the Staff concerning the applicability of license fees for these revisions (Reference: D. G. Eisenhower's letter of August 7, 1980), our check for \$4000 is attached for one Class III amendment.

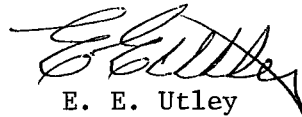
The enclosed revisions provide Technical Specifications, as requested, in the areas of Emergency Power Supply Requirements, Valve Position Indication, Instrumentation for Inadequate Core Cooling, Containment Isolation, Auxiliary Feedwater Systems, and Shift Technical Advisor. Because H. B. Robinson does not have standard Technical Specifications, the format had to be significantly adjusted to fit the Robinson Technical Specifications, but CP&L believes that all items have been adequately addressed. Requested changes to the Technical Specifications are indicated by a vertical bar in the right-hand margin of the attached replacement pages.

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Mr. Eisenhut's letter of July 2, 1980 also requested that the Operating License for HBR Unit No. 2 be amended to include license conditions related to a System Integrity Measurements Program and Improved Iodine Measurements capability. The requested proposed license conditions were incorporated into Sections 4.16 and 4.17 (Surveillance Requirements) of the Technical Specifications because the H. B. Robinson plant staff considered this a more appropriate location for these requirements.

If you have any questions regarding this request, please contact my staff.

Yours very truly,



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

JHE/jc (0187)
Attachments

cc: Mr. J. D. Neighbors (NRC)
Mr. J. P. O'Reilly (NRC-RII)

Sworn to and subscribed before me this 5th day of November 1980

Franklin Murray
Notary Public

My Commission expires: October 4, 1981

