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 AUTH. NAME AUTHOR AFFILIATION
 EURY, L.W. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

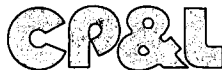
SUBJECT: Application for amend to License DPR-23 revising Tech Specs
 to clarify limiting conditions of operation for pressurizer
 code safety valves.

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Carolina Power & Light Company

OCT 22 1982

Office of Nuclear Reactor Regulation
ATTN: 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 -
LIMITING CONDITIONS FOR OPERATION

Dear Mr. Varga:

SUMMARY

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 (TS) for the H. B. Robinson Steam Electric Plant (HBR) Unit No. 2. These revisions provide further clarification for the Limiting Conditions for Operation (LCO) for the Pressurizer Code Safety Valves.

DETAILS

TS 3.1.1.3.a states that at least one Pressurizer Code Safety Valve shall be operable whenever the Reactor Head is on the vessel. This LCO is required to provide a path for pressure relief in the event that all residual heat removal capability were lost. The amount of steam which could be generated under this condition, at the safety valve relief pressure, would be less than the capacity of a single safety valve.

At each refueling outage, the three (3) Pressurizer Code Safety Valves (SVs) are all removed for bench testing and setpoint verification. Because of the refueling floor equipment configuration at the start of a refueling outage, the SVs must be removed when the reactor head is still on the vessel. CP&L believes that this practice fully meets the intent of the Technical Specification in that the pipe, with the removed pressurizer safety valve, provides more relief capability than an installed safety valve.

During a recent internal Quality Assurance (QA) audit at HBR, it was identified that we were not in literal compliance with this LCO. We believe we meet the intent of this LCO, but the wording of the LCO should be revised for clarification. NRC Region II is aware of this situation and agrees that a clarification of the LCO is needed.

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PDR ADDCK 05000261
P PDR

Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Adm

Therefore, we propose to revise this LCO for clarification. The affected page is enclosed for your review.

The requested change to the TS LCO constitutes one Class II amendment in accordance with 10CFR 170.22. Accordingly, our check for \$1,200.00 is enclosed.

Should you have any questions regarding this matter, please contact my staff.

Yours very truly,



L. W. Eury
Senior Vice President
Power Supply

DCW/lr (n-49)
Enclosure

L. W. Eury, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.


Notary (Seal)

My commission expires: OCT 04 1986

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRR)

