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

SUBJECT: Application for amend to License DPR-23, revising Tech Specs
 Section 3.6, "Containment Sys," to allow performance of CRD
 evolution when containment integrity not intact while
 maintaining required level of safety.

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Carolina Power & Light Company

SERIAL: NLS-84-186

AUG 01 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
CONTROL ROD DRIVE EVOLUTIONS

Dear Mr. Varga:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2). These revisions will provide more flexibility for Cycle 10 startup and routine plant operation by allowing the performance of various control rod drive evolutions when containment integrity is not intact while maintaining the required level of safety. While this TS change is not mandatory to support Cycle 10 startup, CP&L would appreciate efforts by your staff to review this submittal as soon as possible as it will reduce the critical path scheduling associated with Cycle 10 and subsequent plant startups. Also included are editorial corrections to TS 3.6.2 and 3.6.3 changing pressure units from "psi" to "psig" and in the basis for TS 3.6 removing the statements "under any circumstances" and "in any occurrence."

DETAILS

The change requested by CP&L to TS 3.6.1.c will provide more flexibility for plant operation while maintaining the required level of safety by allowing the performance of (1) the rod drop timing test, (2) the rod drive mechanism timing test, (3) the control rod exercise, and (4) the positioning of the control rods in support of a plant startup when containment integrity is not intact.

Performance of the rod drop timing test (number (1) above) is currently allowed by TS 3.6.1.c.

The rod drive mechanism timing test (number (2) above) is performed while at cold shutdown. The control rod exercise (number (3) above) is a test that is performed while at cold shutdown, hot shutdown, and at power to fulfill the TS requirements of Table 4.1-1, Item 9 and Table 4.1-3, Item 2. Abnormal rod

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configurations during these tests will not cause an unsafe situation because of the requirement to maintain the reactor $\geq 1\%$ $\Delta k/k$ shutdown margin when containment integrity is not established. Pulling the control rods out five steps with the shutdown banks fully withdrawn (number (4) above) should prevent the rods from becoming bound or stuck (i.e., due to thermal expansion) and ensure their operability if and when required.

The purpose of containment integrity is to prevent the release of radioactivity in the unlikely event of an accident. In cold shutdown the transient of concern is a boron dilution event. The $\geq 1\%$ $\Delta k/k$ shutdown requirement allows sufficient time to identify this transient prior to going critical with rods withdrawn as allowed by this specification.

Limiting transients resulting from these control rod evolutions have been analyzed in the updated Final Safety Analysis Report (FSAR) and in the Plant Transient Analysis for H. B. Robinson Unit 2 at 2300 Mwt with Increased $F_N^{\Delta H}$, XN-NF-84-74 (to be submitted by August 17, 1984). Therefore, these proposed changes do not constitute an unreviewed safety question.

SIGNIFICANT HAZARDS DETERMINATION

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revisions involve no significant hazards considerations because the proposed changes remain within acceptable criteria and are bounded by analyses detailed in the updated FSAR and in the Plant Transient Analysis referenced above. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. The attached proposed changes fall within the Commission's example (vi) of a change not likely to involve a significant hazards consideration.

ADMINISTRATIVE

The affected pages are attached for your use. Changes are denoted by vertical bars in the right margin.

In accordance with 10 CFR 170.12, a check in the amount of one hundred and fifty dollars (\$150.00) in payment of a license amendment application fee is attached.

If you have any questions concerning this request, please contact Mr. S. R. Zimmerman of our Nuclear Licensing Staff.

Yours very truly,



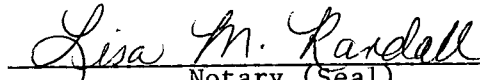
A. B. Cutter - Vice President
Nuclear Engineering & Licensing

ONH/ccc (98910NH)
Attachments

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

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: 5/18/88


Notary (Seal)

