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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME: AUTHOR AFFILIATION
 MCDUFFIE, M.A. 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
 in response to Generic Ltr 82-16, "NUREG-0737 Tech Specs."
 Fee paid.

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Carolina Power & Light Company

MAY 15 1985

SERIAL: NLS-85-156
NRC TAC NO.: 49753

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
NUREG-0737 TECHNICAL SPECIFICATIONS
GENERIC LETTER 82-16

Dear Mr. Varga:

SUMMARY

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) in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101. These revisions are in response to Generic Letter No. 82-16 (GL 82-16), "NUREG-0737 Technical Specifications".

DETAILS

The Company responded to Generic Letter No. 82-16 on December 23, 1982. On March 12, 1985, we informally received notice that the NRC was concerned with the responses to two items.

The first item concerns shift manning overtime limits. Although the NRC approved our shift manning overtime limits policy by letter dated November 5, 1981 (S. A. Varga to J. A. Jones), the NRC requires that the overtime limits be specified in the TS. Attached TS page 6.2-1 has been revised to include the overtime limits.

The second item concerns reporting of safety valve and relief valve failures and challenges. Although CP&L reports safety and relief valve failures under 10CFR50.72 and reports challenges to these valves on an annual basis in accordance with plant administrative procedures, the NRC requires the reporting requirements in the TS. Attached TS page 6.9-9 has been revised to include the reporting of safety and relief valve challenges.

SAFETY ANALYSIS

Neither TS change constitutes an unreviewed safety issue; the changes involve incorporating existing Plant Operations Manual administrative requirements in the TS.

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SIGNIFICANT HAZARDS DETERMINATION

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revision involves no significant hazards considerations because the proposed changes add requirements not currently included in the TS. The Commission has provided guidance concerning the application of its standards set forth in 10CFR50.92 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 that constitutes the additional limitation, restriction, or control not presently included in the TS; for example, a more stringent surveillance requirement. The enclosed proposed changes fall within the Commission's example (ii) of changes not likely to involve a significant hazards consideration.

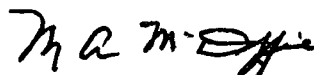
ADMINISTRATIVE

In accordance with 10CFR170.12, a check in the amount of \$150 in payment of a license amendment application fee is attached.

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

If you have any questions concerning this request, please contact Mr. S. D. Floyd at (919) 836-6901.

Yours very truly,



M. A. McDuffie
Senior Vice President
Nuclear Generation

MAM/ccc (1456SDF)
Attachments

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

M. A. McDuffie, 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)

