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 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Application for amend to License DPR-23, changing Tech Specs
 to delete refs to low temp physics tests from Sections
 3.3.1.1 & 3.3.2.1 & safety-related snubber listings, per
 Generic Ltr 84-13.

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Carolina Power & Light Company
SEP 24 1985

SERIAL: NLS-85-116

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
MISCELLANEOUS ADMINISTRATIVE TECHNICAL SPECIFICATIONS CHANGES

Dear Mr. Varga:

SUMMARY

Carolina Power & Light Company (CP&L) hereby requests the enclosed 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 requested revisions are basically administrative or editorial in nature addressing various areas of the TS. A discussion of each change and its justification are presented in the subsequent "Description of Changes" section of this transmittal.

SIGNIFICANT HAZARDS

Carolina Power & Light Company has reviewed these requests in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed TS revisions involve no significant hazards consideration. This involved an evaluation of the proposed change with respect to the criteria established in 10 CFR 50.92. Specific justification is provided in the following "Description of Changes" section to demonstrate that operation of the facility in accordance with the proposed change would not:

- (1) *involve a significant increase in the probability or consequences of an accident previously evaluated; or*
- (2) *create the possibility of a new or different kind of accident from any accident previously evaluated; or*
- (3) *involve a significant reduction in a margin of safety.*

In addition, the justification of the No Significant Hazards Determination is augmented by consideration of the guidance concerning application of this standard as provided by "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration" as published in the Federal Register on April 6, 1983 (48 FR 14864). In each case, CP&L views these changes as administrative or editorial in nature and,

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therefore, consistent with the guidance provided by paragraph (i) of the "Examples of Amendments Considered not Likely to Involve Significant Hazards Consideration" published in 48 FR 14864. That example states that the amendment would likely be found to involve no significant hazards consideration if it was "a purely administrative change to the TS: for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature." Additional discussion necessary to substantiate that conclusion and address the specific 10 CFR 50.92 criteria is provided within the change description and justification presented below.

DESCRIPTION OF CHANGES

(1) *Low Temperature Physics Tests*

The proposed changes to TS 3.3.1.1 and 3.3.2.1 delete references to low temperature physics tests. Low temperature physics testing is only required for the initial startup of the plant and is, therefore, limited to a first cycle requirement. The tests are no longer required and references to these tests should be removed from the TS to avoid potential confusion and "clean up" the TS to facilitate its use.

This amendment is considered administrative in nature and, therefore, determined to present no significant hazards consideration. Since these are obsolete references, their deletion from the TS in no way degrades any aspect of the requirements which could conceivably affect any safety parameters or margins of safety in the plant. The change does not impact the plant's capability to respond to any safety challenges or mitigate the consequences of any postulated accident. Therefore, the change does not adversely affect any of the previously listed 10 CFR 50.92 criteria and is considered to present no significant hazards considerations.

(2) *Snubbers*

As suggested by NRC's Generic Letter 84-13, deletion of the safety related snubbers listings (Table 3.13-1 and Table 3.13-2) from the H. B. Robinson TS eliminates the need for frequent TS amendments to incorporate changes in the snubber listing. This list of individual snubber location, size, and system affected will be maintained in the plant procedures. This change request also deleted internal references to the TS tables.

This amendment is considered administrative in nature and, therefore, determined to present no significant hazards consideration. The proposed change merely relocates the official listing of safety related snubbers from the TS to plant procedures as recommended by the NRC. The plant operating procedures are a more appropriate vehicle for such a listing since they provide adequate controls to assure proper maintenance and review of the list without incurring the excessive administrative burden (on both the NRC and CP&L) associated with maintenance of the list within the TS. The proposed change does not relieve any restrictions concerning the operability, functional requirements, quality controls, or inspection program applicable to these safety-related snubbers. Although the location of the list would be changed, the criteria which establishes the applicability of snubbers to the safety-related classification (and therefore the contents of the list itself) would not be affected. Therefore, the proposed change would not have any affect on the

reliability or functional requirements of any snubbers in the plant. Consequently, the plant's reliability and capability to respond to any postulated or conceivable accident scenarios is unaffected by this change. Based on these considerations, CP&L has determined that none of the previously listed 10 CFR 50.92 significant hazard criteria are adversely affected by this change.

(3) *Turbine Trip Logic*

Table 4.1-1, "Minimum Frequencies for Checks, Calibrations, and Tests of Instrument Channels," inappropriately lists the turbine trip logic verification as a calibration as opposed to a test.

Turbine Trip Logic involves contact closure rather than a calibrated setpoint value. The contact closure results from equipment performing a function (breaker operation or relay contact operation). Therefore, testing is a more appropriate terminology for verifying the operability of this function than calibration. The frequency of the operability verification remains unchanged.

Operation of the Turbine Trip Logic is not degraded by this change of terminology. The actual operability check procedure, acceptance criteria, and frequency are not changed. Proper system operation is still covered by the refueling interval functional test.

This amendment is considered administrative in nature and, therefore, determined to present no significant hazards consideration. This change is inconsequential to any aspect of the operation of the plant or maintenance of any equipment. The impact of correctly listing the Turbine Trip Logic as a test instead of a calibration is limited to having it correctly designated in the table. The procedure and frequency of the check are unchanged. Therefore, the change will in no way affect any aspect of plant operation. As such, there is no possibility of adversely affecting any of the previously listed 10 CFR 50.92 criteria and the change clearly qualifies as involving no significant hazards consideration.

(4) *Environmental Qualification*

TS 6.14, Environmental Qualification, was imposed by order dated October 24, 1980. TS 6.14.1 imposed an implementation deadline of June 30, 1982 for environmental qualification of safety-related electrical equipment. That deadline was subsequently suspended by 10 CFR 50.49. TS 6.14.2 establishes a deadline of December 1, 1980 to provide complete and auditable centralized records of environmental qualification documentation. This records retention requirement is presently addressed by 10 CFR 50.49(j). Therefore, these requirements have been superseded and the special provisions of TS 6.14 are no longer appropriate or necessary. TS 6.14 serves no purpose and should be removed.

This revision has been determined to involve no significant hazards consideration. This is an obsolete administrative restriction which is no longer appropriate. Although the EQ program itself has obvious potential safety ramifications, the provisions of TS 6.14 have been superseded by revised requirements in more appropriate regulatory vehicles. Therefore, TS 6.14 no longer has any effect on that program's requirements or implementation and its deletion has no impact on any aspect of the plant's operation. As such, it does not constitute a significant hazards consideration.

ADMINISTRATIVE

The affected pages are included as an enclosure 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 \$150 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,



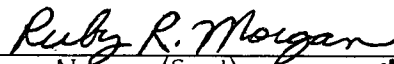
A. B. Cutter - Vice President
Nuclear Engineering & Licensing

MDM/ccc (1352NLU)

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)

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: 11/27/89


Notary (Seal)

