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 RECIP. NAME RECIPIENT AFFILIATION
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Application for amend to License DPR-23, changing Tech Specs to reduce reporting requirements for primary coolant iodine spiking from short-term rept (special rept or LER) to item included in annual rept, per Generic Ltr 85-19.

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Carolina Power & Light Company

SERIAL: NLS-86-439

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Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of Licensing - A
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
REPORTING REQUIREMENTS FOR PRIMARY COOLANT SPECIFIC ACTIVITY LEVELS

Dear Mr. Varga:

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. This change is based on recommendations made in Generic Letter 85-19 concerning primary coolant iodine spiking.

DESCRIPTION OF CHANGE

This TS change will reduce the reporting requirements for primary coolant iodine spiking from a short-term report (Special Report or Licensee Event Report) to an item included in the Annual Report which is reformatted similar to Standard Technical Specification format. The information to be included in the Annual Report is similar to that previously required in the Licensee Event Report, but designates more clearly the results to be included from the specific activity analysis. Additionally, the reporting of challenges to primary safety and relief valves has been removed as a Special Report and included as part of the Annual Report.

Existing requirements to shut down the plant if coolant iodine activity limits are exceeded for greater than 800 hours in a twelve month period have been eliminated since current fuel management practices and reporting requirements would preclude ever approaching the limit. Section 50.72(b)(1)(ii) of 10 CFR requires immediate NRC notification of fuel cladding failures that exceed expected values or are caused by unexpected factors. Thus, this limit in the TS is no longer necessary.

SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in

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the probably or consequences of an accident previously evaluated; (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. Carolina Power & Light Company has determined that:

- (1) The requested amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because changing the reporting requirements and eliminating the coolant iodine limit would not adversely affect the accident analysis or safety margins as currently defined. Other controls and operating limits currently implemented would prevent the Final Safety Analysis Report assumptions from being exceeded as a result of severely degraded fuel.
- (2) The requested amendment does not create the possibility of a new or different kind of accident than previously evaluated for the same reasons discussed in item (1) above.
- (3) The requested amendment does not involve a significant reduction in a margin of safety for the same reasons discussed in item (1) above.

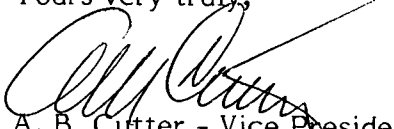
ADMINISTRATIVE

The affected pages from Sections 3.1.4, 6.9.1, and 6.9.3 are included 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. Jan Kozyra at (919) 836-7924.

Yours very truly,


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

ABC/BAT/crs (3090BAT)

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)

