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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 CUTTER, A. B. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Application for amend to License DPR-23, revising Tech Spec.
 Figure 3.10-3 re normalized axial dependence factor for Fq
 vs elevation. Fee paid.

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Rec'd w/ check \$ 150.00



Carolina Power & Light Company

SERIAL: NLS-86-239

JUL 14 1986

Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR 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
REVISED K(z) CURVE - TECHNICAL SPECIFICATION FIGURE 3.10-3

Dear Mr. Rubenstein:

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 a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2). The change specifically addresses a change to the graph of "Normalized Axial Dependence Factor For F_q versus Elevation" as depicted in Figure 3.10-3 of the TS.

The requested amendment results from the plant-specific small break LOCA analysis performed to satisfy the requirements of NUREG-0737 Item II.K.3.31 as discussed in Mr. Steven A. Varga's letter dated July 10, 1985. The supporting analysis, NOTRUMP, (Enclosure 2) for this amendment request satisfies the II.K.3.31 requirement. The report provides justification for the requested increase of the K(z) curve (Figure 3.10-3) 12-foot intercept from 0.431 to 0.647. The report will be incorporated into the Updated Final Safety Analysis Report (FSAR), and accordingly, is written in the FSAR format.

SIGNIFICANT HAZARDS

CP&L has reviewed this amendment request in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed change would involve no significant hazards considerations. This involved an evaluation of the proposed change with respect to the criteria restated below.

A proposed amendment to an operating license . . . involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment 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.*

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CP&L has determined that:

- (1) The requested amendment does not involve a significant increase in the probability or consequences of a previously evaluated accident because the change is supported by an approved analytic methodology which demonstrates that the maximum peak cladding temperature for postulated small breaks would be 1398°F. This result is clearly within the Acceptance Criteria Limits of 10 CFR 50.46 and in no case limiting.
- (2) The requested amendment does not create the possibility of a new or different kind of accident than previously evaluated because the change reflects the results of an enhanced, approved analytical method for a previously analyzed scenario and does not involve new or different accidents.
- (3) The requested amendment does not involve a significant reduction in a margin of safety because it reflects the results of an enhanced, approved analytical methodology and demonstrates results well within the Acceptance Criteria Limits of 10 CFR 50.46. In fact, the present analysis demonstrates an increased margin.


ADMINISTRATIVE

The revised version of the TS page affected by this request (Figure 3.10-3, Page 3.10-22) is included as Enclosure 1 for your use.

In accordance with 10 CFR 170.17, a check in the amount of \$150 in payment of a license amendment application fee is enclosed.

If you have any questions concerning this request, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,


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

ABC/JSK/vaw (3991JSK)

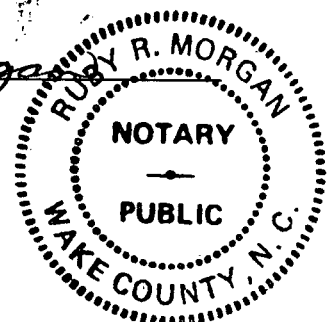
Enclosures

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)



ENCLOSURE 1