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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  
 Record Services Branch (Document Control Desk)

SUBJECT: Application for amend to License DPR-23, revising Tech Specs  
 to incorporate guidance of Generic Ltr 85-09 re reactor trip  
 breaker design mods. Fee paid.

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Rec'd w/ check \$150.00



Carolina Power & Light Company

JAN 12 1987

SERIAL: NLS-87-015

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENDMENT FOR  
REACTOR TRIP BREAKER DESIGN MODIFICATIONS (GENERIC LETTER 85-09)

Dear Gentlemen:

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 No. 2 (HBR2).

This change incorporates the guidance of Generic Letter 85-09 and is submitted in accordance with Mr. Glode Requa's letter dated October 10, 1986. The proposed change requires independent testing of the undervoltage and shunt trip attachments of the reactor trip breakers on a monthly basis, testing of the bypass breakers prior to use, and independent testing of the control room manual switch contacts and wiring during each refueling outage. The testing requirements are added to TS Table 4.1-1.

#### SIGNIFICANT HAZARDS ANALYSIS

Carolina Power & Light Company has reviewed the subject TS change request in accordance with the standards set forth in 10 CFR 50.92 and determined that this change does not constitute a significant hazard based upon the following considerations:

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously analyzed because the amendment adds new testing requirements whose purpose is to help ensure functioning of the reactor trip system when needed. The change is intended to reduce the frequency of, or eliminate entirely, postulated Anticipated Transients Without Scram (ATWS) events.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated because the amendment adds new testing requirements intended to reduce the frequency of, or eliminate entirely, postulated ATWS events.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety because the amendment adds additional testing requirements which effect an increase in the margin of safety.

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PDR ADOCK 05000261  
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ADMINISTRATIVE

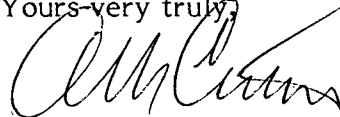
Please note that our initial response dated December 20, 1985 to Generic Letter 85-09 contained a discussion which demonstrates that periodic surveillance testing of the bypass breakers would provide only small improvement in RPS availability. The discussion presented in that letter was taken directly from the Westinghouse Owners' Group (WOG) suggested response to Generic Letter 85-09. Subsequent internal CP&L review by our independent review function has identified certain changes concerning the provisions of the WOG recommendations resulting from assumptions pertaining to site-specific application of these WOG calculations to the H. B. Robinson installation. While use of site-specific assumptions would have caused some difference in the results of the analysis, submittal of this letter supercedes our December 20, 1985 letter; therefore, the issue is moot.

The revised TS pages are included for your use.

In accordance with 10 CFR 170.12, 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/vp (5106JSK)

Enclosure

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)

