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 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
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SUBJECT: Application for amend to License DPR-23,changes Tech Spec to incorporate surveillance testing of reactor trip breakers.

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**Carolina Power & Light Company**

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10CFR50.90

M. A. McDUFFIE  
Senior Vice President  
Nuclear Generation

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)

Gentlemen:

As a result of discussions with NRC staff, Carolina Power & Light Company (CP&L) hereby supplements the January 12, 1987 request for a revision to the Technical Specification (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2).

The January 12, 1987 letter requested a revision to the HBR2 TS to incorporate surveillance testing of the reactor trip and bypass breakers as well as the associated diverse trip features. During a conference call on January 20, 1988, NRC staff requested that operability requirements for reactor trip breakers, associated diverse trip features, and the trip logic also be specifically included in HBR2 TS. This supplement includes proposed operability requirements for reactor trip breakers (including bypass breakers), diverse trip features, and the trip logic. The proposed operability requirements are contained in a new TS Section 3.10.5.

The proposed change incorporates operability requirements for originally installed equipment into the Technical Specifications. Since no physical modifications have been made, no procedural relaxation has been affected, and no changes to operating parameters or setpoints have been made, the proposed amendment does not involve an adverse safety impact. The proposed amendment, then, continues to ensure safe operation and preserve current operating margins.

**SIGNIFICANT HAZARDS ANALYSIS**

Carolina Power & Light Company has reviewed the subject TS change request in accordance with the standards set forth in 10CFR50.92 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 incorporates originally installed reactor protection equipment into TS to ensure safe plant operation. In addition this amendment would add operability requirements that are not currently governed by TS.

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- 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 this change adds originally installed reactor protection equipment to the specifications. Since no physical modification or relaxation to current procedures have been made, no new or different kind of accident can be created by the proposed amendment.
- 3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety because operability requirements assure that the equipment is maintained in a state of operational readiness. Operating parameters and setpoints are not being changed, therefore, the margin of safety is not affected.

To further substantiate this no significant hazards conclusion, CP&L has reviewed the guidance provided by "Example of Amendments Considered Not Likely to Involve Significant Hazards Consideration," as published in the Federal Register (51 FR 7765). This requested change is comparable to example (ii) of that NRC guidance which provides that a change would likely be found to involve no significant hazards consideration if it "constitutes an additional limitation, restriction, or control not presently included in the TS."

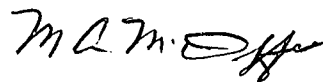
#### ADMINISTRATIVE

The revised TS pages are included for your use; changes are indicated by a single bar in the right hand margin.

A check in payment of license amendment application fee is not enclosed as this is a supplement to our January 12, 1987 request for amendment.

If you have any questions concerning this matter, please contact Mr. L. I. Loflin at (919) 836-6242.

Yours very truly,



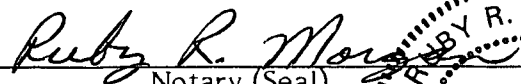
M. A. McDuffie

MAM/DBB/mss (5452JSK)

cc: Dr. J. Nelson Grace  
Mr. R. Lo  
Mr. L. Garner (NRC - HBR)  
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: 11/27/89

  
Notary (Seal)

