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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, increasing quantity of diesel generator fuel oil required to be stored onsite.

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Carolina Power & Light Company

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Senior Vice President
Nuclear Generation

SERIAL: NLS-88-195
10CFR50.

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
LICENSE AMENDMENT REQUEST
DIESEL GENERATOR FUEL INVENTORY

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.

This change will increase the quantity of diesel generator fuel oil required to be stored onsite. This increased minimum inventory will ensure that sufficient fuel is available to operate one diesel generator at its rated design capacity for seven days following a design basis event. This change, along with changes recently submitted in Amendment 6 to the HBR2 FSAR, corrects the inconsistencies noted by the Safety System Functional Inspection (SSFI) conducted between March 9 and April 15, 1987 (see IE Report 87-06; IFI 87-06-22).

In addition to the increased inventory requirement imposed by TS Sections 3.7.1.d and 4.6.2, the bases for these sections have been revised to reflect the rationale used to calculate the required inventory. The existing basis requires that the fuel inventory is sufficient for seven days' minimum engineered safety feature equipment operation.

The revised basis uses the more conservative fuel inventory criteria that the diesel generator is assumed to operate at its rated design capacity for the entire duration of the required run. This precludes the need to maintain a minimum safety equipment loading time line simply to establish the required fuel oil inventory. Since one diesel is necessarily adequate to carry the minimum safety equipment loads, ensuring that the fuel oil inventory is sufficient to operate one diesel at its rated capacity for seven days will automatically maintain an inventory which will conservatively fulfill the original TS requirement.

Similar revisions to the basis have been applied to the fuel oil inventory requirements for the Unit 2 fuel oil storage tank. Here again, references to minimum safety equipment loads have been replaced with conservative assumptions that the diesel generator(s) is operated at rated design capacity for the required duration of the run.

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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 increasing the required fuel oil inventory increases the length of time the diesels can function before resupply is necessary. This change to administratively maintain an increased minimum fuel oil inventory in the Unit 1 tank does not impact the combustible loading for the Unit 2 Fire Hazard Analysis. Since no change in plant system's configuration is required to achieve the inventory increases, nor does any fuel oil storage system contribute to any previously analyzed accident sequence, the proposed change cannot increase the probability or consequences of previously analyzed accidents.
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 places administrative controls on fuel oil inventory. No unanalyzed accidents can result from this change. No change in plant system's configuration is required, therefore, no new accident or different kind of accident than previously evaluated can be introduced.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety because this increase in minimum diesel fuel inventory improves margins of safety by assuring seven days operation of one diesel at its rated design capacity. Additional fuel oil inventory adds to the margin of safety. This results from providing sufficient fuel oil to allow the diesels to be operated to their rated design capacity without limiting operation to only minimum required safety features.

ADMINISTRATIVE

The TS pages reflecting these changes are provided for your use; changes are indicated by a single bar in the right margin.

In accordance with 10CFR170.12, 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. L. I. Loflin at (919) 836-6242.

Yours very truly,

M. A. McDuffie
M. A. McDuffie

MAM/MDM/mss (5450MDM)

cc: Regional Administrator (NRC-Region II)
Mr. R. Lo
NRC Resident Inspector -RNP
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

Ruby R. Morgan
Notary (Seal)

