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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-8,adding surveillance requirements to TS Table 4.1-3.

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Carolina Power & Light Company

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A. B CUTTER
Vice President
Nuclear Services Department

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

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.

The proposed revision adds surveillance requirements to Table 4.1-3 for the automatic bus transfers on the Auxiliary Feedwater System (AFW) valve V2-16A and Service Water (SW) to Turbine Building Cooler valve V6-16C. The proposed revision is consistent with the commitment stated in CP&L's letter dated April 11, 1988. The change requires a refueling interval test of the thermal and magnetic trip of elements of the molded case circuit breakers (MCCBs) associated with valves V2-16A and V6-16C.

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 testing proposed is performed while the reactor is in cold shutdown/refueling and the systems tested are not required to be operable. In addition, there is no accident previously analyzed that is initiated by the AFW or SW systems components involved. Also, since no accidents for which AFW provides a mitigation function occur while the reactor is in cold shutdown/refueling, no accident consequences can increase. The SW valve involved is redundant to other valves which isolate cooling to the nonsafety-related secondary system plant auxiliaries following a station blackout coincident with a Safety Injection actuation to minimize the non-safety loads on SW during that event.

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The testing to be performed is done at a time when accidents coincident with station blackout are not postulated, therefore, no accident consequences can be increased.

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 no changes to existing equipment are involved, and the breakers being tested and their associated valves will be verified operable prior to returning the plant to a condition requiring their operability, therefore, no failure mechanisms are introduced.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety since the testing noted will not alter any accident mitigating function required, and assures the breakers will perform their intended function. The existing margin of safety is preserved.

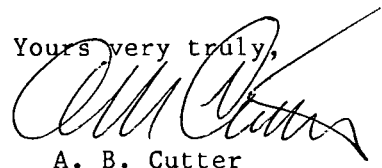
In addition, the proposed amendment is similar to Example ii of amendments likely to involve no significant hazards consideration: "[a] change that constitutes an additional ... control not presently included in the technical specifications" as published in the Federal Register on March 6, 1986.

ADMINISTRATIVE

The TS page reflecting the proposed change is provided for your use; changes are indicated by a single bar in the right margin.

If you have any questions concerning this request, please contact Mr. L. I. Loflin at (919) 546-6242.

Yours very truly,



A. B. Cutter

ABC/JSK/crs (311CRS)

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC - HBR)
Mr. R. Lo
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)

