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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,incorporating
 battery chargers & associated surveillances in Tech Specs.

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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. Specifically, the request changes are: (1) incorporation of the battery chargers and associated surveillances into the TS, (2) provision of an action statement for the batteries, and (3) clarification of the presently required 5-year surveillance test for the batteries. Accordingly, changes are proposed in TS Sections 3.7 and 4.6.3.

Also, an administrative change to Section 3.7.1.d.5 is proposed to remove confusing terminology. The start failure of fuel racks does not "trip" the fuel rack. It causes the governor to quickly close the fuel racks; therefore, it should be called "start failure - governor shutdown". Miscellaneous corrections of administrative errors in the Bases are also noted.

SIGNIFICANT HAZARDS ANALYSIS

A. BATTERY CHANGES

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.

Addition of battery chargers to the TSs will not increase the probability of an accident as the battery chargers are not initiators of any previously analyzed accidents. The new battery chargers are operated in a similar manner to the existing chargers which were previously reviewed during initial licensing. The availability of the new backup chargers would, therefore, tend to decrease the probability of a malfunction of the charging system from impacting

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the battery mitigating safety function. Accident consequences would not increase since the battery mitigation function would be enhanced by the new TSs in that the new specifications provide limits on unavailability of the charger where no previous limits existed. The addition of backup chargers would further limit charger unavailability thereby enhancing battery availability for its accident mitigation function.

The existing TS required both batteries to be available for criticality. With no specific action statement for loss of a battery, the action required would be that of TS 3.0, i.e., place the unit in hot shutdown within the next 8 hours and cold shutdown within the next 30 hours. Specifically calling this action out at TS 3.7 only clarifies the required action.

Regulatory position C.5 of Regulatory Guide 1.93, December 1974, "Availability of Electric Power Sources" provides the NRC's bases for allowing a 2-hour unavailability time for redundant DC power supplies. This position is the industry standard basis for redundant DC electrical power supply out-of-service times. Since the new action statement incorporates the presently existing shutdown requirement, and the regulatory position is that a 2-hour unavailability for a redundant train is acceptable, no increase in the probability of occurrence or consequences of an accident exists. Since no new equipment nor change to existing equipment is involved with the battery action statement, no malfunction of equipment can be introduced.

The proposed TS 4.6.3.5 and 4.6.3.6 imposes the requirement to load test the battery and perform a service test to assess the battery design duty cycle following a battery change or a significant load change. The accepted standard guidance for this test is IEEE 450-1980 and was committed to by CP&L. The procedures implementing these TSs conform to that guidance. Since they are performed based on an accepted standard, there is no increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously analyzed.

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.

The new chargers are operated in a manner similar to the existing chargers which were previously reviewed. Therefore, no accident or malfunction of a different type than previously evaluated is created.

As noted in 1 above, an existing shutdown requirement is restated in a different place for clarification. The unavailability time is that allowed by NRC per Regulatory Guide 1.93. Since no new equipment or change to existing equipment has been introduced, this item can not create the possibility for an accident or malfunction of a different type.

For the same reasons stated in 1 above, this item cannot create the possibility for an accident or malfunction of a different type.

3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety.

The TSs Bases state the margin of safety as follows: "One battery charger shall be in service so that the batteries will always be at full charge in anticipation of a loss-of-AC power incident. This ensures that adequate DC power will be available for emergency uses." In addition, "station batteries will deteriorate with time, but precipitous failure is extremely unlikely. The surveillance specified is that which has been demonstrated over the years to provide an indication of a cell becoming unserviceable"

The changes to the TSs as proposed provide limiting conditions and actions where none previously existed or clarify the testing to be performed to assure adequacy. The margin of safety as expressed above is embodied in the 1-hour duty cycle of the batteries and the capability of the plant to be shut down with one of the redundant batteries unavailable as documented in the FSAR.

A recent modification assured that the backup chargers provided were adequately sized to supply the duty cycle noted. Carolina Power & Light Company's commitment to IEEE 450-1980 assures the testing performed will assess the capacity of the batteries. Since none of the changes noted diminish the duty cycle nor the plant's shutdown capability, the margin of safety is preserved.

B. ADMINISTRATIVE CHANGES

The changes in the number of 480 volt and 4160 volt buses and the charging pump power supply in Section 3.7 bases reflect the present as-built condition of the plant. The addition of the word removal and change of incident to accident reflect the proper name of equipment and events. These changes are all purely administrative in nature and as such cannot increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety as previously analyzed. These changes cannot create the possibility for an accident or malfunction of a different type than any previously evaluated nor reduce the margin of safety as defined in the basis for any Technical Specification.

While evaluating concerns involving the protective trips features of the emergency diesel generators in early 1988, it was found that confusion existed regarding the protective trip required to be bypassed by TS 3.7.1.d.5. On evaluating the control circuitry for this trip, it was found that the trip functioned as required by the TS and the UFSAR. However, it did not trip the fuel racks as stated in the Specification. The trip was actually caused by the engine governor repositioning the fuel racks to the shutdown position. By using the proper name for the trip in the TS, the confusion could be eliminated.

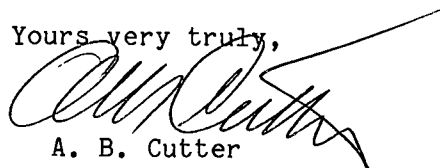
1. Operation of the facility, in accordance with the proposed amendment, would not involve a significant increase in the probability or consequences of an accident previously analyzed because no changes are being made to plant equipment or procedures which could affect any accident scenarios. The proposed changes are nomenclature only and correction of administrative errors.
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 plant operations and equipment are not changed. The proposed changes involve nomenclature and corrections to the Bases.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety because no physical changes are made which can affect the margin of safety; the changes involve nomenclature and corrections.

ADMINISTRATIVE

The TS pages reflecting the proposed changes are 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

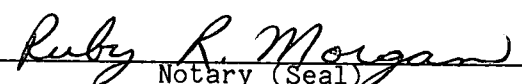
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Enclosure

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)

