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ACCESSION NBR:8910170276 DOC.DATE: 89/10/11 NOTARIZED: YES DOCKET #
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SUBJECT: Application for amend to License DPR-23, increasing quantity of DG fuel oil required to be stored onsite to 34,000 gals.

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Carolina Power & Light Company

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SERIAL: NLS-89-266
10CFR50.90

OCT 11 1989

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
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 to 34,000 gallons. 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 supersedes a previous request submitted on November 30, 1988; however, the significant hazards analysis in the previous submittal remains valid and is restated herein for convenience. The calculational basis for the previous request erroneously did not account for the diesels' auxiliary loads and their efficiency and had proposed a requirement of 32,000 gallons. Additionally, please note that our license amendment request dated May 8, 1989, regarding station batteries and administrative changes, also proposes changes to TS pages 3.7-1, 3.7-4, 4.6-2 and 4.6-4. That request is not yet approved.

In addition to the increased inventory requirement imposed by TS Section 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.

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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.

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:

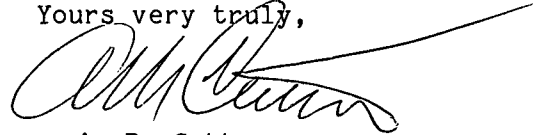
1. Operation of the facility, in accordance with the proposed amendment, would not involve a significant increase in the probability or consequences of an accident previously analyzed because increasing the required fuel oil inventory increases the length of time the diesels can function before resupply 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 Hazards 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. A discussion of the basis for the change and safety analysis are included as Attachment 1.

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

Yours very truly,



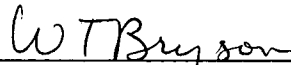
A. B. Cutter

ABC/JSK/crs (483CRS)

Attachment

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.



Notary (Seal)

My commission expires: 8/16/92

ATTACHMENT 1

Basis for Change/Safety Analysis

The methodology used to determine the total fuel oil retention requirement is that recommended by Regulatory Guide 1.137, "Fuel Oil System for Standby Diesel Generators," Regulatory Position C.1.c and ANSI N195-1976, "American National Standard, Fuel Oil System for Standby Diesel Generators," Section 5.4.

Increasing the required fuel oil inventory increases the length of time the diesels can function before resupply is necessary. It would allow diesel loading up to its nameplate loading (rated design capacity) rather than requiring operator attention for selective load shedding. Since no change in plant system configuration is required to achieve the inventory increase, nor does any fuel oil storage system contribute to any previously analyzed accident sequence, the enclosed change cannot increase the probability or consequences of a previously analyzed accident.

This change modifies existing administrative controls for fuel oil inventory. No change in plant systems configuration is required, therefore, no new accident or different kind of accident than previously evaluated can be introduced.

This increase in diesel fuel oil inventory enhances the margin of safety by assuring sufficient fuel oil is available to allow seven days operation of a diesel at its rated design capacity without limiting operation to only minimum safety features.