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SUBJECT: Advises that util plans to submit LAR to implement GL-88-16
guidance & COLR into TS, upon approval of 900824 TSCR.

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JUN 5 1990

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

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BASIS CHANGE CONCERNING PDC-3 METHODOLOGY

Gentlemen:

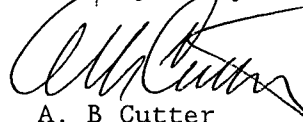
On August 24, 1989 Carolina Power & Light Company (CP&L) submitted a License Amendment request to incorporate the results of analyses using Advanced Nuclear Fuel's new PDC-3 methodology into the Technical Specifications.

Recent conversations with NRC indicate a concern by the staff that certain assumptions are sufficiently important to the application of the PDC-3 methodology to warrant their inclusion in the Bases to the Technical Specifications.

Carolina Power & Light Company concurs that the documentation of these assumptions into the Bases is appropriate. Upon approval of the PDC-3 license amendment CP&L plans to submit another license amendment request to implement the guidance of Generic Letter 88-16 and incorporate a Core Operating Limits Report into the Technical Specifications. That request will require extensive reformatting of the Technical Specifications and Bases. CP&L proposes to include the Bases relevant to the PDC-3 methodology in the COLR submittal. Cycle 14 operations will be conducted under the NRC approved PDC-3 topical report. The PDC-3 basis changes will be submitted prior to start up from Refueling Outage 14. The draft proposed wording is included as Attachment 1.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,



A. B. Cutter

JSK/ecc (699ECC)

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

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CP&L Proposed Generic Bases Wording

Current power distribution control methodology, as applied on a H. B. Robinson Unit 2 plant specific basis, places certain restrictions on core characteristics which affect the validity of the power distribution control curves as provided each cycle in the COLR. The restricted core characteristics are:

- a) Restrictions are placed on the maximum number of twice burned non-blanketed fuel assemblies which may be placed in the core and,
- b) The bank D control rod reactivity worth is restricted such that its value must be bounded by those values assumed in the most recent application of the power distribution control methodology to H. B. Robinson.

The purpose of these restrictions is to make the power distribution curves plant specific but not core or reload specific, that is, if current core characteristics meet the restrictions on a) and b) above, the most recently developed power distribution control curves remain valid for the current reload. If at any time the noted restrictions cannot be met for a proposed core reload, the current power distribution control curves are not valid and re-analysis using the NRC-approved methodology is necessary to provide new curves.

Specific numerical values for the number of twice burned non-blanketed assemblies allowed in the core and on the bounding bank D control rod reactivity worth are provided in Reference 2 of Technical Specification 6.9.3.3.b (NRC-approved power distribution control methodology) which details the most recent application(s) of the power distribution control methodology to H. B. Robinson.