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 CUTTER,A.B. Carolina Power & Light Co.
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SUBJECT: Application for amend to License DPR-23, revising Tech Spec
 6.2-2 re overtime limits, per Generic Ltr 82-12.

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JUL 9 1990

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 - OVERTIME LIMITS

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 administrative amendment will provide consistency with the overtime work limits promulgated by Generic Letter 82-12. The amendment also re-numbers subsequent items within TS Section 6.2.3, as appropriate. A Supporting Analysis/Safety Analysis is attached.

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 this change provides administrative controls and thus has no effect on the probability or consequences of any accident previously evaluated. The change is intended to minimize fatigue among the operating staff and accident mitigation may, in fact, be enhanced.
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 is an administrative change which does not present the possibility of any new or different kind of accident from those previously evaluated.

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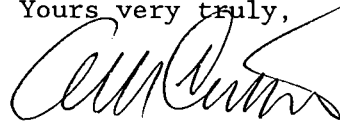
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety because this is an administrative change which may actually enhance the margin of safety by enhancing operator alertness and attentiveness.

ADMINISTRATIVE

The TS pages reflecting the changes are provided for your use; changes are indicated by a single bar in the right margin. Carolina Power & Light Company requests that this amendment be effective upon the date of issuance but that implementation be allowed within 60 days to allow for orderly revisions to the appropriate plant procedures.

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

Yours very truly,



A. B. Cutter

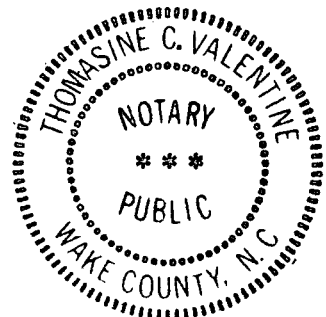
JSK/ecc (745ECC)
Enclosures

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: 1-31-95



SUPPORTING ANALYSES/SAFETY ANALYSES

The existing Technical Specification 6.2.3 is based on NRC requirements issued in 1980 as Item I.A.1.3 to NUREG-0737. In June of 1982, the NRC issued Generic Letter No. 82-12 which amended Item I.A.1.3. Carolina Power & Light Company (CP&L) responded to this Generic Letter in December of 1982 and submitted that the existing CP&L Overtime Policy (based on the 1980 requirements) was consistent with the intent of the Generic Letter. This policy was implemented into the Technical Specifications as Item 6.2.3.(a) by NRC letter dated September 12, 1985, which issued Amendment 95 to the Technical Specifications.

Subsequent review has determined that changes are needed to more fully comply with the specific requirements provided in Generic Letter No. 82-12. This License Amendment request is intended to revise the Technical Specifications to more fully incorporate these requirements. In this way, proper controls will be established "to prevent situations where fatigue could reduce the ability of operating personnel to keep the reactor in a safe condition." These controls are intended to assure that, "to the extent practicable, personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision making capability."*

*Statements in quotes were excerpted from the revised "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors," provided as an attachment to NRC Generic Letter No. 82-12.