



Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

AUG 23 1991

SERIAL: NLS-91-211
10CFR50.90

G. E. VAUGHN
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 - REMOVAL OF 3.25 TIMES SURVEILLANCE INTERVAL
EXTENSION LIMIT

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 for the H. B. Robinson Nuclear Power Plant, Unit 2.

Technical Specification Surveillance 4.0 permits surveillance intervals to be extended up to 25 percent of the specified interval. In addition, Specification 4.0.1c limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. This technical specification change request proposes to remove the 3.25 limitation from the specification in accordance with the guidance provided by NRC in Generic Letter 89-14.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 is an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides the proposed Technical Specification pages.

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Please refer any questions regarding this submittal to Mr. Steven Chaplin at
(919) 546-6623.

Yours very truly,



G. E Vaughn

GEV/SDC

Enclosures:

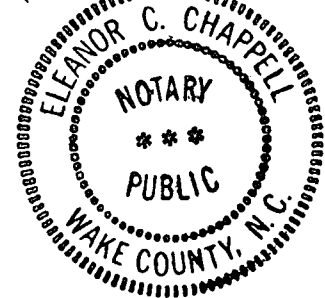
1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Environmental Evaluation
4. Technical Specification Pages

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo
Mr. H. G. Shealy (SC)
Attorney General (SC)

G. E. Vaughn, 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.

Eleanor C. Chappell
Notary (Seal)

My commission expires: 2/6/94



ENCLOSURE 1

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT

BASIS FOR CHANGE REQUEST

Proposed Change

Technical Specification Surveillance 4.0 permits surveillance intervals to be extended up to 25 percent of the specified interval. In addition, Specification 4.0.1c limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. This technical specification change request proposes to remove the 3.25 limitation from the specification in accordance with the guidance provided by NRC in Generic Letter 89-14¹.

Basis

Technical Specification Surveillance 4.0 permits surveillance intervals specified in each system/equipment specification to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance, such as under transient conditions or other ongoing surveillance or maintenance activities. Specification 4.0.1c also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

As discussed by the NRC staff in the enclosure to Generic Letter 89-14;

'Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

'The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are

¹ Generic Letter 89-14, 'Line-Item Improvements In Technical Specifications - Removal of the 3.25 Limit On Extending Surveillance Intervals', issued by NRC on August 21, 1989.

performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25-percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the staff concluded that removal of the 3.25 limit will have an overall positive impact on safety.

In conformance with the guidance provided in the Generic Letter, CP&L submits the attached revision to Specification 4.0.1c and addition of Bases Section 4.0.

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 DOCKET NO. 50-261/LICENSE NO. DPR-23 REQUEST FOR LICENSE AMENDMENT

10CFR50.92 EVALUATION

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

Technical Specification Surveillance 4.0 permits surveillance intervals to be extended up to 25 percent of the specified interval. In addition, Specification 4.0.1c limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. This technical specification change request proposes to remove the 3.25 limitation from the specification in accordance with the guidance provided by NRC in Generic Letter 89-14.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because there is no physical change or alteration to the facility that could cause the probability of an accident to increase. In addition, removal of the 3.25 combined interval limit enhances safety by reducing the potential of a forced shutdown or performing surveillance during unsuitable plant conditions.
2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the design of the facility and system operating parameters are not changing. Surveillance intervals are not changing and will continue to be limited to the 25% extension.
3. The proposed amendment does not involve a significant reduction in the margin of safety because surveillance frequencies will retain the 25%

extension limit which is an acceptable extension tolerance, as documented in Generic Letter 89-14, sufficient to ensure the reliability of equipment. Maintaining equipment in a reliable condition does not introduce a reduction in any margin of safety.

ENCLOSURE 3

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ENVIRONMENTAL CONSIDERATION

10CFR51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

Technical Specification Surveillance 4.0 permits surveillance intervals to be extended up to 25 percent of the specified interval. In addition, Specification 4.0.1c limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. This technical specification change request proposes to remove the 3.25 limitation from the specification in accordance with the guidance provided by NRC in Generic Letter 89-14.

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite since removal of the administrative limit has no effect on the plant, its operation or effluents.
3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure since removal of the administrative limit does not impose additional or otherwise alter surveillances of equipment which involve occupational exposure.