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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S. R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Updates 860428 licensing issues for timely resolution re
 fire protection exemptions, radioactive effluent Tech Specs,
 integrated leak rate test amend & inservice insp relief
 requests. Status of amend requests encl. W/o encl.

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Carolina Power & Light Company

SERIAL: NLS-86-306

AUG 20 1986

Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing - A
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
LICENSING ITEMS FOR PRIORITY CONSIDERATION

Dear Mr. Rubenstein:

This letter is to update you regarding certain licensing issues considered by Carolina Power & Light Company (CP&L) to have high priority for timely resolution. The listing contained herein is not intended to be a comprehensive list of all outstanding and future issues, rather a periodic list of items for attention. This letter supersedes my letter dated April 28, 1986.

1. Fire Protection Exemptions - There are currently three fire protection exemptions outstanding. Resolution of these exemptions would constitute the final licensing staff actions regarding 10 CFR 50, Appendix R. Resolution of this issue would allow closing of several I&E open items. Avoided costs resulting from granting of these exemptions were provided to the Project Manager by telephone on August 4, 1986.
2. Radioactive Effluent Technical Specification (RETS) Correction Amendment - This amendment request was submitted on November 6, 1985, prior to full implementation of the RETS. Modification of Radiation Monitor RMS-20 was performed prior to RETS implementation. Existing Technical Specifications do not accurately reflect actual plant configuration.
3. Integrated Leak Rate Test Amendment - This amendment request was submitted on July 17, 1984 and pre-noticed on November 21, 1984; issuance is desired prior to our next refueling outage scheduled for early spring, 1987. This amendment would allow an abbreviated integrated leak rate test using the methodology of BN-TOP-1. Our most recent submittal regarding this issue was February 6, 1986.
4. K(Z) Amendment - An amendment request was submitted on July 14, 1986 which would revise the K(Z) curve (Technical Specification Figure 3.10-3). This amendment will be needed to support Cycle 12 operation which follows the next refueling.

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5. Enriched Fissionable Material Amendment - An amendment request was submitted on August 13, 1986 to delete Technical Specification Paragraph 5.3.1.6 which limits the amount of enriched fissionable material on site for purposes of monitoring of core neutron flux to 10 grams. Appropriate controls are provided in License Condition 2.c. Issuance of this amendment by October 23, 1986 is needed to allow delivery of flux detectors to be installed during the next refueling pursuant to Regulatory Guide 1.97. A related amendment request regarding increasing the enrichment limit on reload fuel will be submitted in the near future.
6. Dedicated Alternate Shutdown Amendment - This amendment request was submitted on March 29, 1985; we have been unable to find evidence of a pre-notice in the Federal Register. Resolution of the issue would allow closing of an I&E open item.
7. In-Service Inspection Relief Requests - An In-Service Inspection Relief Request regarding pressure retaining welds in the reactor vessel was submitted on April 22, 1986. Action on this request will allow CP&L to modify the ISI program or submit an additional relief request as appropriate. A response by September 15, 1986 is required for outage planning purposes.
8. Appendix B Technical Specification - The Radiological Environment Technical Specification (RETS) Amendment Request dated February 7, 1983 noted that the existing radiological effluent requirements of Appendix B to the Technical Specifications would be superseded and should be deleted upon issuance of the RETS. This action was not included in the subsequent RETS amendment. Carolina Power & Light Company has verbally requested review of the status of this issue to determine whether any further action was required by CP&L to delete the obsolete requirements and avoid possible problems due to inconsistencies between these requirements.

By letter dated October 18, 1985, CP&L requested that the NRC's proposed Non-Radiological Environmental Technical Specification not be included in Appendix B of the Technical Specifications. The basis for this request was that the proposed non-radiological requirements were already adequately and more appropriately controlled by existing Environmental Protection Agency requirements specified within the National Pollutant Discharge Elimination System (NPDES) Permit.

Attachment 1 to this letter is a status of outstanding amendment requests.

Please contact me if you have any comments or questions regarding these issues.

Yours very truly,



S. R. Zimmerman
Manager

Nuclear Licensing Section

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Attachment

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)