DUKE ENERGY®

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10 CFR 50.36

Serial: RNP-RA/14-0090

AUG 0 6 2014

ATTN: Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

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

SUPPLEMENT TO H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 (HBRSEP2) ORIGINAL SUBMITTAL REGARDING LICENSE AMENDMENT REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE TO USE NRC-APPROVED TSTF-491, REVISION 2, REMOVAL OF MAIN STEAM AND MAIN FEEDWATER VALVE ISOLATION TIMES FROM TECHNICAL SPECIFICATIONS

References:

1. Letter from Sharon A. Wheeler-Peavyhouse (Duke Energy Progress, Inc.) to the U.S. Nuclear Regulatory Commission (Serial: RNP-RA/13-0077), *License Amendment Request for Technical Specifications (TS) Change to Use NRC-Approved TSTF-491, Revision 2, Removal of Main Steam and Main Feedwater Valve Isolation Times From Technical Specifications,* dated September 30, 2013, ADAMS Accession Number ML13283A012

Ladies and Gentlemen:

By letter dated September 30, 2013 (Reference 1), Duke Energy Progress, Inc. submitted a license amendment request to adopt TSTF-491, Revision 2.

Duke Energy Progress, Inc. is submitting this supplement to Reference 1 to inform the NRC staff of HBRSEP2's incorporation of changes to Reference 1 as discussed with the NRC Project Manager by teleconference on July 28, 2014. Updated markup Technical Specifications Bases pages are provided via enclosure to this letter.

There are no regulatory commitments made in this submittal. If you have any questions regarding this submittal, please contact Mr. R. Hightower at (843) 857-1329.

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: AUG 0 6 2014

Sincerely,

R.M. Glover / for

W. R. Gideon
Site Vice President

WRG/jmw

Enclosure

cc: Mr. V. M. McCree, NRC, Region II
Ms. Martha C. Barillas, NRC Project Manager, NRR
NRC Resident Inspector, HBRSEP2

U. S. Nuclear Regulatory Commission
Enclosure to Serial RNP-RA/14-0090
5 Pages (including cover sheet)

SUPPLEMENT TO H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 ORIGINAL SUBMITTAL REGARDING LICENSE AMENDMENT REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE TO USE NRC-APPROVED TSTF-491, REVISION 2, REMOVAL OF MAIN STEAM AND MAIN FEEDWATER VALVE ISOLATION TIMES FROM TECHNICAL SPECIFICATIONS (ML13283A012)

Supplemental Technical Specifications Bases Pages

The markup TS Bases pages have been revised as discussed per teleconference. The revised pages are provided by means of this Enclosure and supersedes those pages conveyed via the original submittal. Please replace the pages of the original submittal as indicated below.

Original Page(s)	Revised Page(s)
TS Bases Markup: B 3.7-12	TS Bases Markup: B 3.7-12
TS Bases Markup: B 3.7-19	TS Bases Markup: B 3.7-19
TS Bases Markup: B 3.7-20	TS Bases Markup: B 3.7-20

BASES

ACTIONS (continued)

C.1 and C.2

Condition C is modified by a Note indicating that separate Condition entry is allowed for each MSIV.

Since the MSIVs are required to be OPERABLE in MODES 2 and 3, the inoperable MSIVs may either be restored to OPERABLE status or closed. When closed, the MSIVs are already in the position required by the assumptions in the safety analysis.

The 8 hour Completion Time is reasonable, considering the low probability of an accident occurring during this time period that would require a closure of the MSIVs.

For inoperable MSIVs that cannot be restored to OPERABLE status within the specified Completion Time, but are closed, the inoperable MSIVs must be verified on a periodic basis to be closed. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, in view of MSIV status indications available in the control room, and other administrative controls, to ensure that these valves are in the closed position.

D.1 and D.2

If the MSIVs cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE REQUIREMENTS

SR 3.7.2.1

within limits (Ref. 4)

This SR verifies that MSIV closure time is ~~≤ 5 seconds~~ on an actual or simulated actuation signal. The maximum MSIV closure time is less than that assumed in the accident and

(continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

within limits (Ref. 4)

This SR verifies that the closure time of each MFRV and bypass valve is ~~< 20 seconds~~ on an actual or simulated actuation signal. The MFRV, and bypass valve closure times are assumed in the accident and containment analyses (Ref. 2). This Surveillance is normally performed upon returning the unit to operation following a refueling outage. These valves should not be tested at power since even a part stroke exercise increases the risk of a valve closure with the unit generating power. This is consistent with the ASME Code, Section XI (Ref. 3).

The Frequency for this SR is in accordance with the Inservice Testing Program. The specified Frequency for valve closure is based on the refueling cycle. Operating experience has shown that these components usually pass the Surveillance when performed at the specified Frequency.

SR 3.7.3.2

within limits (Ref. 4)

This SR verifies that the closure time of each MFIV is ~~< 50 seconds~~ on an actual or simulated actuation signal. The MFIV closure times are assumed in the accident and containment analyses (Ref. 2). This Surveillance is normally performed upon returning the unit to operation following a refueling outage. These valves should not be tested at power since even a part stroke exercise increases the risk of a valve closure with the unit generating power. This is consistent with the ASME Code, Section XI (Ref. 3).

The Frequency for this SR is in accordance with the Inservice Testing Program. The specified Frequency for valve closure is based on the refueling cycle. Operating experience has shown that these components usually pass the Surveillance when performed at the specified Frequency.

(continued)

BASES (continued)

REFERENCES

1. UFSAR, Section 10.4.6.
2. UFSAR, Chapter 15.
3. ASME, Boiler and Pressure Vessel Code, Section XI.
4. TRM, Section 4.0