

**AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL**  
(TEMPORARY FORM)

CONTROL NO: 11351

FILE: \_\_\_\_\_

FROM Carolina Power & Light Co. Raleigh, N.C. 27602 E.E. Utley			DATE OF DOC 11-1-74	DATE REC'D 11-5-74	LTR X	TWX	RPT	OTHER
TO: Mr. E. Case			ORIG 3 signed	CC	OTHER	SENT AEC PDR XX SENT LOCAL PDR XX		
CLASS	UNCLASS XXX	PROP INFO	INPUT X	NO CYS REC'D 40		DOCKET NO: 50-261		

DESCRIPTION: Ltr notarized 11-1-74 requesting for License Amdt-Rev. of Tech Specs. to remove the requirement for radiation analysis of benthic organisms & substitute requirements for analysis of aquatic vegetation & trans:

ENCLOSURES: Revision to Tech Specs in the form of a page change.....

**ACKNOWLEDGED**

PLANT NAME: H.B. Robinson Unit 2

(40 cys encl rec'd)

**Do Not Remove**

**FOR ACTION/INFORMATION**

DHL 11-7-74

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**INTERNAL DISTRIBUTION**

<b>REG FILE</b> AEC PDR OGC, ROOM P-506A MUNTZING/STAFF CASE GIAMBUSSO BOYD MOORE (L) (BWR) DEYOUNG (L) (PWR) SKOVHOLT (L) GOLLER (L) P. COLLINS DENISE REG OPR FILE & REGION (2) MORRIS STEELE	<b>TECH REVIEW</b> SCHROEDER MACCARY KNIGHT PAWLICKI SHAO STELLO HOUSTON NOVAK ROSS IPPOLITO TEDESCO LONG LAINAS BENAROYA VOLIMER	<b>DENTON</b> GRIMES GAMMILL KASTNER BALLARD SPANGLER  <b>ENVIRO</b> MULLER DICKER KNIGHTON YOUNGBLOOD REGAN PROJECT LDR <b>DITTMAN</b> HARLESS	<b>LIC ASST</b> DIGGS (L) GEARIN (L) GOULBOURNE (L) KREUTZER (E) LEE (L) MAIGRET (L) REED (E) SERVICE (L) SHEPPARD (L) SLATER (E) SMITH (L) TEETS (L) WILLIAMS (E) WILSON (L)	<b>A/T IND</b> BRAITMAN SALTZMAN B. HURT  <b>PLANS</b> MCDONALD CHAPMAN DUBE w/input E. COUPE  D. THOMPSON (2) KLECKER EISENHUT <b>Schemel</b>
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**EXTERNAL DISTRIBUTION**

1 - LOCAL PDR Hartville, S.C	1 - NATIONAL LABS	1 - PDR-SAN/LA/NY
1 - TIC (ABERNATHY) (1)(2)(10)	1 - ASLBP(E/W Bldg, Rm 529)	1 - BROOKHAVEN NAT LAB
1 - NSIC (BUCHANAN)	1 - W. PENNINGTON, Rm E-201 GT	1 - G. ULRIKSON, ORNL
1 - ASLB	1 - B&M SWINEBROAD, Rm E-201 GT	1 - AGMED (RUTH GUSSMAN) Rm B-127 GT
1 - Newton Anderson	1 - CONSULTANTS	1 - R. D. MUELLER, Rm E-201 GT
16 - ACRS [REDACTED] SENT TO	NEWMARK/BLUME/AGBABIAN	
LIC. ASST. S. TEETS 11-7-74		



Carolina Power & Light Company

November 1, 1974

Regulatory

File Cy.

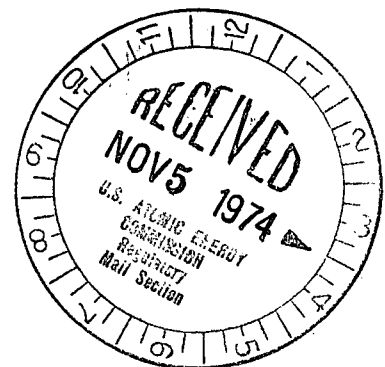
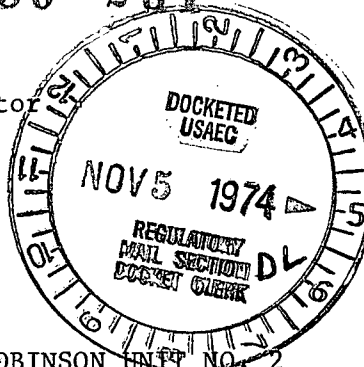
File: NG-3514 (R)

50 - 261

Serial: NG-74-1244

Mr. Edson G. Case, Acting Director  
Directorate of Licensing  
Office of Regulation  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Dear Mr. Case:



H. B. ROBINSON UNIT NO. 2  
LICENSE DPR-23

REQUEST FOR LICENSE AMENDMENT - REVISION OF TECHNICAL SPECIFICATIONS

In accordance with the Code of Federal Regulations, Title 10, Part 50.59, Carolina Power & Light Company hereby requests a revision to the Technical Specifications for its H. B. Robinson Unit No. 2 Plant. The revision would remove the requirement for radiation analysis of benthic organisms, and substitute requirements for analysis of aquatic vegetation. The revision is attached in the form of a page change to the present Technical Specifications.

Carolina Power & Light Company has made repeated efforts to collect benthic organisms, both by segregation from bottom sediments and by individual collection methods. These efforts have been made by Carolina Power & Light Company's Environmental Assessment Group, but have been unsuccessful due to their near absence in the Robinson impoundment. This problem was identified to the Commission in a letter of November 17, 1971, from Carolina Power & Light Company. However, failure to provide results of benthic organism analysis has been construed as a Technical Specification violation by the Regulatory Operations branch of the AEC, thus necessitating this submittal.

The primary objective of the radiological surveillance program described in Table 4.10-1 of the Technical Specifications is the detection of changes in the environment and the evaluation of long-term buildup of radionuclides in the environment surrounding the nuclear plant, thus permitting a determination of the fate of radionuclides released from the plant and accumulation in various environmental media and organisms. In addition, the data provided by the program provides an estimation of the probable dose to an individual and the population in the vicinity of the plant. Since there are essentially no benthic organisms in the Robinson impoundment there is no concentration mechanism and no exposure pathway to man.

Mr. Edson G. Case

- 2 -

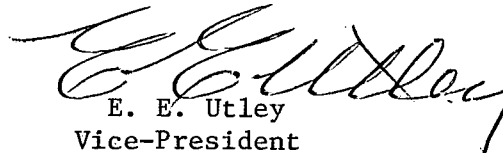
November 1, 1974

In the absence of benthic organisms, aquatic vegetation is a suitable substitute to accomplish the objectives of the program. In addition, bottom sediments are collected quarterly from four locations and analyzed for gross beta, potassium-40, and gamma spectrometry. Any benthic organisms contained in the bottom sediments will be analyzed along with the sediments.

The expeditious handling of this matter, in view of the ruling of the Regulatory Operations branch, will be greatly appreciated.

As required by Commission Regulations, this submittal is signed under oath by a duly authorized officer of the Company.

Yours very truly,

  
E. E. Utley  
Vice-President  
Bulk Power Supply

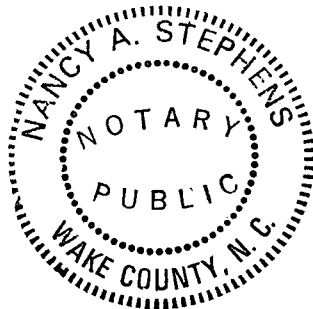
DBW:mvp  
Attachment

cc: Messrs. N. B. Bessac  
W. B. Howell  
J. B. McGirt  
D. V. Menscer  
D. B. Waters

Sworn to and subscribed before me this 1st day of November.

  
Nancy A. Stephens (Yancey)  
Notary Public

My commission expires: *June 29, 1976*



File Cy-

Regulatory

Received w/ Ltr Dated 11-17-74

TABLE 4.10-1

Type Sample	Number of Sampling Points	Frequency	Type of Analysis
A. ATMOSPHERE			
1. Particulate	2	Weekly	Gross Beta after 72-hours decay, Gamma Spectra if Beta > 100 pci/M <sup>3</sup>
2. Radiation Dosimeters	22	Monthly	Gamma
B. WATER			
1. Surface (lake)	2	Weekly	Gross Beta and H <sup>3</sup> , Gamma Spectra and Sr <sup>90</sup> if Beta > 10 <sup>-7</sup> uci/ml.
	1	Monthly Composite	Gross Beta and H <sup>3</sup> , Gamma Spectra and Sr <sup>90</sup> if Beta > 10 <sup>-7</sup> uci/ml.
	1	Quarterly	Gross Beta and H <sup>3</sup> , Gamma Spectra and Sr <sup>90</sup> if Beta > 10 <sup>-7</sup> uci/ml.
2. Ground	2	Quarterly	Gross Beta and H <sup>3</sup> , Gamma Spectra and Sr <sup>90</sup> if Beta > 10 <sup>-7</sup> uci/ml.
C. MISCELLANEOUS			
1. Soil	2	Semi-Annual	Gross Beta, K <sup>40</sup> , Gamma Spectra
2. Bottom Sediments (Lake)	4	Quarterly	Gross Beta, K <sup>40</sup> , Gamma Spectra
3. Fish	1	Quarterly	Gross Beta, K <sup>40</sup> in flesh, Sr <sup>90</sup> in bone, Gamma Spectra and Sr <sup>90</sup> in flesh if Beta > 60 pci/gm.
4. Aquatic Vegetation	2	Semi-Annual	Gamma Spectra, Sr <sup>89</sup> , Sr <sup>90</sup>