

AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL  
(TEMPORARY FORM)

CONTROL NO: 7738

FILE:

FROM: Carolina Power & Light Company Raleigh, N. C. 27602 N. B. Bessac			DATE OF DOC 10-19-73	DATE REC'D 10-23-73	LTR X	MEMO	RPT	OTHER
TO: D. J. Skovholt			ORIG 3 signed	CC 37	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
CLASS	UNCLASS XXXX	PROP INFO	INPUT XX	NO CYS REC'D 40	DOCKET NO: 50-261			

DESCRIPTION:

Ltr re our 10-16-73 ltr, which trans change No. 24 to Tech. Spec.....requesting that definition (b) of Tech 31012.1.1 be revised.....

ENCLOSURES:

**ACKNOWLEDGED**

**DO NOT REMOVE**

PLANT NAME: H. B. Robinson Unit 2

FOR ACTION/INFORMATION 10-23-73 GC

BUTLER(L) W/ Copies	SCHWENCER(L) W/ Copies	ZIEMANN(L) W/ Copies	REGAN(E) W/ Copies
CLARK(L) W/ Copies	STOLZ(L) W/ Copies	DICKER(E) W/ Copies	W/ Copies
GOLLER(L) W/ Copies	VASSALLO(L) W/ Copies	KNIGHTON(E) W/ Copies	W/ Copies
KNIEL(L) W/ Copies	✓SCHEMEL(L) W/ 9 Copies	YOUNGBLOOD(E) W/ Copies	W/ Copies

INTERNAL DISTRIBUTION

✓ <u>REG FILE</u>	<u>TECH REVIEW</u>	DENTON	<u>LIC ASST</u>	<u>A/T IND</u>
✓AEC PDR	HENDRIE	GRIMES		BRAITMAN
✓OGC, ROOM P-506A	SCHROEDER	GAMMILL	DIGGS (L)	SALTZMAN
✓MUNTING/STAFF	MACCARY	KASTNER	GEARIN (L)	B. HURT
CASE	KNIGHT	BALLARD	GOULBOURNE (L)	<u>PLANS</u>
GIAMBUSSO	PAWLICKI	SPANGLER	LEE (L)	MCDONALD
BOYD	SHAO		MAIGRET (L)	✓DUBE
MOORE (L)(BWR)	STELLO	<u>ENVIRO</u>	SERVICE (L)	<u>INFO</u>
DEYOUNG(L)(PWR)	HOUSTON	MULLER	SHEPPARD (E)	C. MILES
✓SKOVHOLT (L)	NOVAK	DICKER	SMITH (L)	✓A. Cabell (ltr)
P. COLLINS	ROSS	KNIGHTON	✓TEETS (L)	
	IPPOLITO	YOUNGBLOOD	WADE (E)	
<u>REG OPR</u>	TEDESCO	REGAN	WILLIAMS (E)	
FILE & REGION(2)	LONG	PROJECT LDR	WILSON (L)	
MORRIS	LAINAS			
STEELE	BENAROYA	<u>HARLESS</u>		
	VOLIMER			

EXTERNAL DISTRIBUTION

✓1 - LOCAL PDR <u>Hartville, S. C.</u>	(1)(2)(10)-NATIONAL LAB'S	1-PDR-SAN/LA/NY
✓1 - DTIE(ABERNATHY)		1-GERALD LELLOUCHE
✓1 - NSIC(BUCHANAN)		BROOKHAVEN NAT. LAB
1 - ASLB(YORE/SAYRE/ WOODARD/"H" ST.	1-W. PENNINGTON, Rm E-201 GT	1-AGMED(Ruth Gussman)
✓16 - CYS ACRS <del>HOLDING</del> SENT TO LIC. ASST.	1-CONSULTANT'S	RM-B-127, GT.
10-23-73 TEETS	NEWMARK/BLUME/AGBABIAN	1-RD..MULLER..F-309 GT
	1-GERALD ULRIKSON...ORNL	

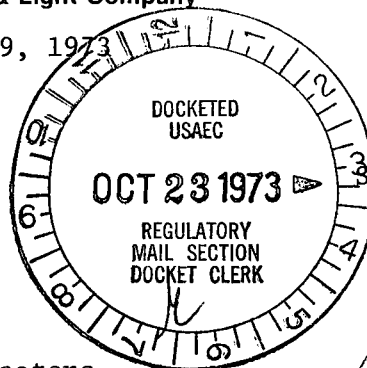
# Regulatory Docket File

## CP&L

Carolina Power & Light Company

October 19, 1973

File: NG 3514



Serial: NG-73-495

Mr. Donald J. Skovholt  
Assistant Director for Operating Reactors  
Directorate of Licensing  
Office of Regulation  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Dear Mr. Skovholt:



H. B. ROBINSON UNIT NO. 2  
LICENSE DPR-23  
TECHNICAL SPECIFICATION CHANGE NO. 24

We are in receipt of your letter of October 16, 1973, in which you forwarded, as an attachment, Change No. 24 to the Technical Specifications for H. B. Robinson Unit No. 2. During our review of the material contained in the attachment, we noted an inconsistency in the definition of the  $\bar{R}$  factor on Page 3.10-2 with its use in determining the limiting values of  $[F_j(z) S(z)]_{\max}$ .

On Page 3.10-6, in the Basis of Section 3.10, it is stated that the limiting value of  $F_q^N$  in Regions 2 and 3 is 2.34, which assures that the linear heat generation rate is limited to 14.2 kw/ft. In the application of this limit to surveillance of  $F(z) S(z)$ , as contained in the equations on Page 3.10-2, Section 3.10.2.1.1, it is stated that allowance has been included in these equations for two uncertainty factors,  $F_q^a$  and  $F_u^N$ , associated with the uncertainty in measurement. In addition, the use of  $F_q^N$  as a limit in relation to the linear heat generation rate assumes the removal of the factor for engineering tolerances  $F_q^E$  (1.03) from the value of the total hot channel factor,  $F_q^T$ .  $F_q^T$  is directly related to the linear heat generation rate. A similar argument is applied to Region 4 limits.

7738

October 19, 1973

In contrast, the definition for  $\bar{R}$  on Page 3.10-2 states that  $F_{qi}^N$  includes factors for uncertainty in measurement and engineering tolerances. Substitution of the relation for  $\bar{R}$  into the above equations for the limiting values reveals that the limits have again been reduced by accounting for uncertainty and engineering factors a second time. We feel that this is unduly restrictive, and that the definition of  $F_{qi}^N$  is in error since the applicable factors have already been accounted for once in the equations. We, therefore, request that definition (b) of Technical Specification 3.10.2.1.1 be revised to read as follows:

- (b)  $\bar{R}_j$ , for thimble  $j$ , is determined for the applicable region from core power maps  $i$  and is by definition:

$$\bar{R}_j = 1/6 \sum_{i=1}^6 \frac{F_{qi}^N}{[F_{ij}(z) S(z)]_{\max}}$$

$F_{qi}^N$  includes a factor for spike penalties.

We appreciate your prompt consideration of this matter.

Yours very truly,



N. B. Bessac  
Manager  
Nuclear Generation

DBW:mvp

cc: Messrs. C. D. Barham  
N. B. Bessac  
T. E. Bowman  
B. J. Furr  
D. V. Menscer  
D. B. Waters