

From: Haeg, Luke
Sent: Wednesday, August 10, 2022 10:35 AM
To: Duc, Joshua Brian
Cc: Ryan.Treadway@duke-energy.com; Wrona, David
Subject: Request for Additional Information Regarding Duke's Request to Remove 4.160 kV Bus 2 from Surveillance Requirement 3.8.1.16 (EPID L-2022-LLA-0064)
Attachments: RAI for Robinson LAR to Remove Bus 2 from SR 3.8.1.16.docx

Dear Mr. Duc,

By letter dated April 28, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22118A367), Duke Energy Progress, LLC (the licensee) submitted a license amendment request (LAR) to amend the Technical Specifications (TSs) for the H.B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The proposed amendment would remove 4.160 kV Bus 2 from Surveillance Requirement 3.8.1.16.

The U.S. Nuclear Regulatory Commission staff is reviewing your submittal and determined that additional information is required in order to complete the review.

A request for additional information (RAI) is attached. The draft RAI was sent to you ensure that it was understandable, the regulatory basis for the question was clear, and to determine whether the information was previously docketed.

Based on a discussion with Mr. Duc, a response to the attached RAI is requested within 30 days from the date of this email.

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-0272 or Lucas.Haeg@nrc.gov.

Luke Haeg
Project Manager
NRR/DORL/LPL2-2
U.S. Nuclear Regulatory Commission
301-415-0272

Hearing Identifier: NRR_DRMA
Email Number: 1746

Mail Envelope Properties (SA0PR09MB64094580191FAC6151E6BF9F98659)

Subject: Request for Additional Information Regarding Duke's Request to Remove 4.160 kV Bus 2 from Surveillance Requirement 3.8.1.16 (EPID L-2022-LLA-0064)
Sent Date: 8/10/2022 10:35:13 AM
Received Date: 8/10/2022 10:35:00 AM
From: Haeg, Luke

Created By: Lucas.Haeg@nrc.gov

Recipients:

"Ryan.Treadway@duke-energy.com" <Ryan.Treadway@duke-energy.com>
Tracking Status: None
"Wrona, David" <David.Wrona@nrc.gov>
Tracking Status: None
"Duc, Joshua Brian" <Joshua.Duc@duke-energy.com>
Tracking Status: None

Post Office: SA0PR09MB6409.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	1395	8/10/2022 10:35:00 AM
RAI for Robinson LAR to Remove Bus 2 from SR 3.8.1.16.docx	25626	

Options

Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

REQUEST FOR ADDITIONAL INFORMATION
REGARDING APPLICATION TO REVISE SURVEILLANCE REQUIREMENT 3.8.1.16 FOR
TECHNICAL SPECIFICATION 3.8.1, "AC SOURCES – OPERATING"
DUKE ENERGY PROGRESS, LLC
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261

INTRODUCTION

By letter dated April 28, 2022, (Agency wide Document Access Management System (ADAMS) Accession No. ML22118A367), Duke Energy Progress, LLC (the licensee), requested an amendment to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The proposed amendment would revise Surveillance Requirement (SR) 3.8.1.16 for Technical Specification (TS) 3.8.1, "AC Sources – Operating" to remove 4.160 kilovolt (kV) bus 2 from the requirement to verify automatic transfer capability from the unit auxiliary transformer (UAT) to a startup transformer (SUT).

The Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee. The staff finds that the following additional information is required to complete the review of the license amendment request (LAR).

REGULATORY BASIS

Title 10 of the *Code of Federal Regulations* (10 CFR) 50.36, "Technical Specifications," requires, in part, that the TS shall be included by applicants for a license authorizing operation of a production or utilization facility. 10 CFR 50.36(c) requires, in part, that Technical Specifications include items in the following categories: (1) Safety limits, limiting safety system settings, and limiting control settings, (2) Limiting conditions for operation (3) Surveillance requirements [SRs], (4) Design features, and (5) Administrative controls. The proposed LAR involves changes under the SR category.

ISSUE

Section 2.1, "System Design and Operation" of the LAR stated, in part:

The 480 V Emergency bus 1 is normally powered from the 115 kV switchyard through the dedicated 115 kV SUT, 4.160 kV bus 6 and station service transformer (SST) 2F...The 4.160 kV buses 1, 2, 4 and 5 are normally powered from the main generator via the UAT...

Section 2.3, "Reason for the Proposed Change" of the LAR stated, in part:

The current SR 3.8.1.16 requires automatic transfer capability of both the 4.160 kV bus 2 and 480 V Emergency bus 1 from the UAT to a SUT. However, normal electrical lineups exist such that 480 V Emergency bus 1 is already

aligned to a SUT when 4.160 kV bus 2 is not. In this configuration, if equipment is taken out of service for maintenance that removes automatic transfer capability of 4.160 kV bus 2, the current SR 3.8.1.16 would not be met.

The NRC staff understands that based on the above statements in Section 2.3 of the LAR, additional normal electrical lineups exist in addition to the normal lineup described in Section 2.1 of the LAR. These additional normal electrical alignments were not described in the LAR, Robinson's Updated Final Safety Analysis Report (UFSAR, ADAMS Accession No. ML21147A414), or Robinson's TS Bases.

INFORMATION REQUESTED

Describe any/all additional normal electrical lineups that exist besides the lineup described in Section 2.1 of the LAR, preferably supported by markups (highlights) of these lineups on the one-line electrical diagram in Robinson's UFSAR, Figure 8.1.2-1A (post-Robinson License Amendment No. 261), in which the current SR 3.8.1.16 would not be met if certain equipment is taken out of service. Also, explain how the proposed revised SR 3.8.1.16 would be met in these additional normal electrical lineups.