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TS 5.6.6

Date: November 1, 2022
Serial: RA-22-0302

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

TECHNICAL SPECIFICATIONS SECTION 5.6.6 POST ACCIDENT MONITORING
INSTRUMENTATION REPORT FOR INOPERABLE CONTAINMENT SUMP WATER LEVEL
(Wide Range)

Duke Energy Progress, LLC hereby submits a report in accordance with H. B. Robinson Steam Electric Plant, Unit No. 2, (HBRSEP2) Technical Specifications (TS) Section 3.3.3, Post Accident Monitoring Instrumentation, and TS 5.6.6, Post Accident Monitoring Instrumentation Report.

The report, which is provided as an attachment to this letter, is based on the inoperability of one Containment Sump Water Level (Wide Range) channel required to be operable per TS.

Please address any comments concerning this matter to David Hall, Manager of Nuclear Support Services at (843) 951-1358.

This letter contains no new regulatory commitments.

Sincerely,

A handwritten signature in black ink that reads "Nicole Flippin". The script is cursive and fluid.

Nicole Flippin
Site Vice President

Attachment: HBRSEP Unit 2 Special Report per Technical Specification 5.6.6

c: NRC Regional Administrator, Region II
Ms. Tanya Hood, NRC Project Manager, NRR
NRC Resident Inspector, HBRSEP

TECHNICAL SPECIFICATIONS SECTION 5.6.6
POST ACCIDENT MONITORING INSTRUMENTATION 14-DAY
REPORT FOR THE CONTAINMENT SUMP WATER LEVEL INDICATION

Description of Condition

As described in Letter dated November 22, 2021 (ADAMS Accession #ML21326A070), HBRSEP2 initiated a report in accordance with Technical Specification (TS) 5.6.6 to describe one channel of Containment Sump Water Level (Wide Range) indication being declared INOPERABLE on November 1, 2021. TS 3.3.3 requires that two channels of Containment Sump Water Level (Wide Range) be OPERABLE in Modes 1, 2 and 3. Limiting Condition for Operation (LCO) 3.3.3 Condition A applies to one channel INOPERABLE and allows 30 days to restore it to OPERABLE or submit a report per TS 5.6.6 within the following 14 days. As one channel (LI-801) was to remain INOPERABLE for greater than 30 days, the report per TS 5.6.6 was transmitted prior to exceeding the 30-day Completion Time.

On September 24, 2022 HBRSEP2 initiated a forced outage. Upon entering Mode 4 on September 25, 2022, LCO 3.3.3 Condition A was exited due to the unit not being in a Mode of Applicability. When the unit entered Mode 3 on October 2, 2022, Condition A of TS LCO 3.3.3 was re-entered. On November 1, 2022, the 30-day Completion Time was exceeded. This report is being submitted in accordance with TS 5.6.6.

TS 5.6.6 states that the report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the channel to operable status.

Preplanned Alternate Method of Monitoring

While one channel of Containment Sump Water Level indication, LI-801, remains INOPERABLE, the redundant channel LI-802 remains in OPERABLE status and is available to provide the required indication. In addition, sufficient preplanned backup indications are available. The backup channels which will be used are: Containment Water Level (LS-1925A, LS-1925B), Containment Sump Water Level (LS-1925C, LS-1925D) and Refueling Water Storage Tank Level (LI-948).

Cause of the Inoperability

The inoperable indication is the result of open circuit conditions on one channel. This event continues to be tracked by the HBRSEP2 Corrective Action Program.

Plans and Schedule for Restoring the Channel

Repair of the remaining inoperable Containment Sump Water Level indication requires entry into the reactor cavity sump which is inaccessible during power operation. Necessary design modifications were not initially planned to be completed prior to the September 24, 2022 forced outage. Repairs will be completed as opportunity allows and no later than the next scheduled refueling outage (November – December 2022), as originally planned.