



Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Serial: RNP-RA/01-0002

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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/LICENSE NO. DPR-23

TRANSMITTAL OF COPIES OF REVISION 6
TO THE TECHNICAL REQUIREMENTS MANUAL

Ladies and Gentlemen:

This letter transmits copies of Revision 6 to the Technical Requirements Manual (TRM) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. Revision 6 to the TRM represents changes associated with required Compensatory Measures for instrumentation to follow the course of an accident. A description of the change is described in Attachment I.

Attachment II provides copies of replacement pages to the TRM, and includes instructions for removing and inserting the pages on the cover page.

One (1) copy is provided for Mr. B. R. Bonser at NRC Region II, one (1) copy is provided for the NRC Resident Inspector, and three (3) copies are provided for Mr. R. Subbaratnam at NRC Headquarters. The recipients are requested to remove and insert pages in accordance with the instructions provided.

If you have any questions concerning this matter, please contact Mr. H. K. Chernoff.

Sincerely,

B. L. Fletcher III
Manager - Regulatory Affairs

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United States Nuclear Regulatory Commission

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Attachments

- I. Summary of Change to Technical Requirements Manual, Revision 6
- II. Instructions for Removal and Insertion of Pages to the Technical Requirements Manual

- c:
- L. A. Reyes, NRC, Region II (w/o attachment)
 - B. R. Bonser, NRC, Region II
 - R. Subbaratnam, NRC, NRR (3 copies attachment)
- NRC Resident Inspector, HBRSEP

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

SUMMARY OF CHANGE TO
TECHNICAL REQUIREMENTS MANUAL, REVISION 6

Description of Change

The Technical Requirements Manual (TRM) requirement 3.10, "Instrumentation to Follow the Course of the Accident," Compensatory Measures were changed as described below.

Required Compensatory Measures B.2, B.3, C.2.1, and C.2.2

With one channel of the required Reactor Coolant System (RCS) Subcooling Monitors inoperable, or with one or more radiation monitoring functions with one required channel inoperable, action must be taken to restore it to OPERABLE status within 7 days. If the channel is not restored a preplanned alternative method must be in place within 14 days, and a Condition Report must be investigated, with the cause(s) and corrective actions identified within 30 days. A 14-day Special Report is no longer required.

Required Compensatory Measures D.1 and D.2

With one channel of the Reactor Vessel Level Instrumentation System (RVLIS) inoperable, action must be taken to restore it to OPERABLE status within 30 days, rather than within 7 days as required previously. If the channel is not restored within the Completion Time, the reactor must be placed in MODE 3 within an additional 12 hours.

14-Day Special Report for Inadequate Core Cooling Monitor and Effluent Monitors

The reporting requirements to provide a 14-day special report were incorporated into Technical Specifications by Amendments No. 59¹ and 94² without comment in the respective Safety Evaluations. Amendment No. 176 relocated the reporting requirements from Technical Specifications as part of the change to Improved Technical Specifications³. Since that time the NRC has revised general reporting requirements contained in 10 CFR 50.72 and 10 CFR 50.73⁴ with the deliberate view of reducing regulatory burden.

The 14-day special report contains three requirements: 1) to implement preplanned alternate monitoring for the variable; 2) to identify the cause of the inoperability; and, 3) to identify corrective actions. The revision to the required Compensatory Measures also contains the same requirements. The preplanned alternate method must be in place within 14 days if the

1. Amendment No. 59 to Facility Operating License and Safety Evaluation, dated August 24, 1981.

2. Amendment No. 94 to Facility Operating License and Safety Evaluation, dated August 29, 1985.

3. Amendment No. 176 to Facility Operating License and Safety Evaluation, dated October 24, 1997.

4. "Reporting Requirements for Nuclear Power Reactors and Independent Spent Fuel Storage Installations at Power Reactor Sites," Final Rule, Federal Register, Volume 65, Number 207. Page 63769.

inoperable channel is not restored within 7 days. Additionally, if the inoperable channel is not restored within 7 days, a Condition Report must be initiated and the investigation and identification of corrective actions completed within 30 days. Thus, the revised requirements provide the same urgency of repair and implementation of alternative methods as the previous 14-day Special Report.

Reactor Vessel Level Instrumentation Completion Time Relaxation

The RVLIS uses differential pressure (d/p) measuring devices to measure vessel level or relative void content of the circulating primary coolant system fluid. The system is redundant and includes automatic compensation for potential temperature variations of the impulse lines. Essential information is displayed in the main control room in a form directly usable by the operator. The functions performed by the RVLIS are the following:

1. Assist in detecting the presence of a gas bubble or void in the reactor vessel;
2. Assist in detecting the approach to Inadequate Core Cooling; and,
3. Indicate the formation of a void in the RCS during forced flow conditions.

RVLIS indication is a Regulatory Guide 1.97⁵ Type D variable. The change in Completion Time for the RVLIS channels is consistent with existing Technical Specification Requirements for Type A variables. The most direct indication of adequate core cooling is provided by the Core Exit temperature monitoring, which is a Type A variable required by Technical Specifications. The 30-day Completion Time for Type A variables is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring accident monitoring instrumentation during this interval. Since the 30-day Completion Time is acceptable for Type A variables in Technical Specifications, the relaxation of the Completion Time for one channel of RVLIS from 7 days to 30 days is also acceptable.

The changes to the TRM were evaluated in accordance with 10 CFR 50.59 and reviewed by the Plant Nuclear Safety Committee.

5. "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Regulatory Guide 1.97, Revision 3, May 1983.

United States Nuclear Regulatory Commission

Attachment II to Serial: RNP-RA/01-0002

7 Pages

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

INSTRUCTIONS FOR REMOVAL AND INSERTION
OF PAGES INTO THE TECHNICAL REQUIREMENTS MANUAL

Replace the following pages as instructed below. Margin lines indicate the revised areas.

Remove

Cover Page (Page 1)

Page 2

Page 3

Page 3b

3.10-2

B 3.10-1

Insert (Rev. 6)

Cover Page (Page 1)

Page 2

Page 3

Page 3b

3.10-2

B 3.10-1

REFERENCE USE

CAROLINA POWER AND LIGHT COMPANY
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 1
PART 2

PLANT PROGRAM PROCEDURE

PLP-100

TECHNICAL REQUIREMENTS MANUAL

REVISION 6

LIST OF EFFECTIVE PAGES

<u>EFFECTIVE PAGES</u>	<u>REVISION</u>
1 (Cover Sheet)	6
2 (LEP)	6
3 (LEP)	6
3a (LEP)	5
3b (LEP)	6
3c (LEP)	5
3d (LEP)	5
4	4
5	0
6	0
7	0
1.1-1	0
1.1-2	0
1.2-1	0
1.2-2	0
1.2-3	0
1.3-1	0
1.3-2	0
1.3-3	0
1.3-4	0
1.3-5	0
1.3-6	0
1.3-7	0
1.3-8	0
1.3-9	0
1.3-10	0
1.3-11	0
1.3-12	0
1.4-1	0
1.4-2	0
1.4-3	0
1.4-4	0
1.4-5	0
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3.0-4	0
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3.2-1	0

LIST OF EFFECTIVE PAGES

<u>EFFECTIVE PAGES</u>	<u>REVISION</u>
3.2-2	0
3.3-1	4
3.4-1	4
3.5-1	0
3.5-2	0
3.6-1	0
3.6-2	2
3.7-1	4
3.8-1	0
3.8-2	0
3.9-1	0
3.9-2	0
3.9-3	0
3.9-4	0
3.10-1	0
3.10-2	6
3.10-3	0
3.10-4	0
3.11-1	0
3.11-2	0
3.12-1	0
3.13-1	0
3.14-1	0
3.15-1	0
3.15-2	0
3.16-1	0
3.17-1	0
3.18-1	0
3.18-2	0
3.18-3	0
3.18-4	0
3.18-5	0
3.18-6	0
3.18-7	0
3.19-1	0
3.19-2	0
3.19-3	0
3.20-1	0
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3.20-3	0
3.21-1	0

LIST OF EFFECTIVE PAGES

<u>EFFECTIVE PAGES</u>	<u>REVISION</u>
B 3.7-1	0
B 3.8-1	0
B 3.9-1	0
B 3.10-1	6
B 3.11-1	0
B 3.12-1	0
B 3.13-1	0
B 3.14-1	5
B 3.15-1	0
B 3.16-1	0
B 3.17-1	0
B 3.18-1	0
B 3.18-2	0
B 3.19-1	0
B 3.20-1	0
B 3.21-1	0
B 3.22-1	0
B 3.23-1	0
B 3.24-1	0
<u>Appendix A</u>	
A - 1	0
A - 2	0
A - 3	0
A - 4	0
A - 5	0
A - 6	0
A - 7	0
<u>Appendix B</u>	
B - 1	0
B - 2	0
B - 3	0
B - 4	0
B - 5	0
B - 6	0
B - 7	0
B - 8	0
B - 9	0
B - 10	0
B - 11	0
B - 12	0
B - 13	0

COMPENSATORY MEASURES (continued)

CONDITION	REQUIRED COMPENSATORY MEASURE	COMPLETION TIME
B. (continued)	B.2 Initiate preplanned alternate method.	14 days
	<u>AND</u> B.3 Investigate and identify the cause of the inoperability, and identify plans for restoring the instrumentation to OPERABLE status.	30 days
C. One or more Functions with one required channel inoperable. <u>OR</u> NOTE..... Only applicable to Function 2. One or more required channels inoperable.	C.1 Restore required channel(s) to OPERABLE status.	7 days
	<u>OR</u> C.2.1 Initiate preplanned alternate method.	14 days
	<u>AND</u> C.2.2 Investigate and identify the cause of the inoperability, and identify plans for restoring the instrumentation to OPERABLE status.	30 days
D. One Reactor Vessel Level Instrumentation System (RVLIS) channel inoperable.	D.1 Restore inoperable RVLIS channel to OPERABLE status.	720 hours
	<u>OR</u> D.2 Be in MODE 3.	732 hours

(continued)

B 3.10 INSTRUMENTATION TO FOLLOW THE COURSE OF AN ACCIDENT

BASES

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters listed in TRMS Table 3.10-1 to monitor and assess these variables during and following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," July 1979.

Required Compensatory Measures B.2, B.3, C.2.1, and C.2.2

With one channel of the required Reactor Coolant System (RCS) Subcooling Monitors inoperable, or with one or more radiation monitoring functions with one required channel inoperable, action must be taken to restore it to OPERABLE status within 7 days. If the channel is not restored a preplanned alternative method must be in place within 14 days, and a Condition Report must be investigated, with the cause(s) and corrective actions identified within 30 days. The Completion Times are reasonable, considering the availability of alternative monitoring methods and the timeliness standards of the Corrective Action Program.

Required Compensatory Measures D.1 and D.2

With one channel of the Reactor Vessel Level Instrumentation System (RVLIS) inoperable, action must be taken to restore it to OPERABLE status within 30 days. If the channel is not restored within the Completion Time, the reactor must be placed in MODE 3 within an additional 12 hours. The Completion Times are reasonable, considering the redundant channel and the low probability of an accident occurring during this time period.
