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**MAR 14 2001**

Mr. Luis A. Reyes, Regional Administrator  
United States Nuclear Regulatory Commission, Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street S. W., Suite 23T85  
Atlanta, GA 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
DOCKET NO. 72-3/LICENSE NO. SNM-2502

REPORT OF CHANGES PURSUANT TO 10 CFR 72.48

Dear Mr. Reyes:

In accordance with the requirements of 10 CFR 72.48(b)(2), Carolina Power & Light Company (CP&L) submits the attached report of changes made pursuant to 10 CFR 72.48(a) at the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Independent Spent Fuel Storage Installation (ISFSI).

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

Sincerely,

B. L. Fletcher III  
Manager - Regulatory Affairs

DJS/djs

Attachment

c: NRC Document Control Desk  
NRC Resident Inspector, HBRSEP, Unit No. 2  
W. F. Kane, Director, USNRC, NMSS  
R. Subbaratnam, USNRC, NRR

**H. B. Robinson Steam Electric Plant, Unit No. 2**  
**Independent Spent Fuel Storage Installation**  
**Changes Made Pursuant to 10 CFR 72.48(a)**

**Description of Change**

**Safety Analysis Summary**

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| 1. The following titles were changed:<br>“Executive Vice President and Chief Nuclear Officer-Energy Supply” to “Senior Vice President and Chief Nuclear Officer-Nuclear Generation Group,” and<br>“President/Chief Executive Officer” to “Executive Vice President-Energy Supply.”  | Changes that are administrative in nature do not increase the probability or consequences of an accident, affect operations of the facility or cause malfunctions of equipment important to safety, create new accident scenarios or malfunctions of equipment important to safety, or reduce the margin of safety. These administrative changes do not alter the Technical Specifications, increase occupational exposure, or impact the environment.   |
| 2. Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR) Sections 3.3.5.1 and 7.1.3 describe the ISFSI fence as “around the ISFSI.” The current fence is partially around the ISFSI. The fence runs in front of the ISFSI and around to the sides. The SAR was changed from “around the ISFSI” to “partially around the ISFSI” when describing the fence in ISFSI SAR Sections 3.3.5.1 and 7.1.3. The entire facility and fencing is located inside the H. B. Robinson Steam Electric Plant, Unit No. 2, protected area. | <p>This is a change to the description of the facility in the SAR to agree with the actual installation. The purpose of the fence is to provide a boundary for control of the ISFSI Radiologically Controlled Area. The current fence and ALARA practices adequately control occupational exposure.</p> <p>This change does not increase the probability or consequences of an accident, cause malfunctions of equipment important to safety, create new accident scenarios or malfunctions of equipment important to safety, or reduce the margin of safety. These administrative changes do not alter the Technical Specifications, increase occupational exposure, or impact the environment.</p> |

**Description of Change**

**Safety Analysis Summary**

3. The ISFSI SAR was updated to reflect a previous modification of the Contaminated Waste Oil Storage System. The Contaminated Waste Oil Storage System has a 10,000-gallon capacity for the accumulation of contaminated waste oil for an estimated 10 years. The ISFSI SAR previously described this system as a two-year temporary storage facility. The words “two year” have been removed from the ISFSI SAR.
  
4. The Meteorological Tower System was modified to replace obsolete equipment. This modification allows for improved data reliability and improved efficiency in the performance of necessary maintenance. ISFSI SAR, Section 2.3.3, “Onsite Meteorological Measurements Program,” was revised to reflect the changes in tower operations.

This change is in Chapter 2 of the ISFSI SAR under “Site Characteristics” and has no impact on the function or analysis of the ISFSI. This change does not increase the probability or consequences of an accident, affect operations of the facility or cause malfunctions of equipment important to safety, create new accident scenarios or malfunctions of equipment important to safety, or reduce the margin of safety. The change has no impact on the occupational exposure or environmental impact of the ISFSI.

The change does not affect the design, construction, installation, maintenance, operation, or testing of systems, structures, or components (SSCs) assumed in the initiation of an accident or mitigation of an accident. The change does not affect SSC’s failure modes or effects. The design and safety margins of SSCs are not affected by the change.

The change does not involve an increase in occupational exposure and does not create an environmental impact. This change upgraded obsolete equipment, which improved the reliability of on-site meteorological data that would be used for the plant’s response to potential releases.

**Description of Change**

**Safety Analysis Summary**

5. a) The ISFSI SAR states that the lowest temperature recorded in the region is  $-5^{\circ}$  F and references the H. B. Robinson Steam Electric Plant, Unit No. 2, Upgraded Final Safety Analysis Report (UFSAR). The UFSAR lowest recorded temperature was changed to  $-9^{\circ}$  F on September 23, 1991. The ISFSI statement regarding that temperature is historical in nature. Reference to the UFSAR has been removed.
- b) The ISFSI SAR discusses the Carolina Power & Light (CP&L) corporate organizational structure and references the UFSAR. The ISFSI discussion of the CP&L corporate organizational structure is historical in nature. The text discusses the organizational structure in place when the ISFSI was constructed and should remain as presented. Reference to the UFSAR in this section has been removed.
- a) The referenced deletion does not change the conclusions of the ISFSI accident analyses in Section 8. The bounding lowest temperature used in the analyses is  $-40^{\circ}$  F. Therefore, the assumptions made in the accident analyses are bounded and remain valid. The lowest recorded ambient temperature does not affect failure modes and effects, and no new accident failure mechanisms or new equipment failure modes were introduced. The margin of safety as defined in the Bases for the Technical Specifications is not affected.
- b) The change to the organization section of the ISFSI SAR has no impact on the design, installation, or operation of the facility. Therefore, these changes do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the ISFSI SAR.