

Mr. Lynn W. Eury
Executive Vice President
Power Supply
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Eury:

SUBJECT: ISSUANCE OF AMENDMENT NO. 137 TO FACILITY OPERATING LICENSE NO. DPR-23 REGARDING REMOVAL OF 3.25 TIMES SURVEILLANCE INTERVAL EXTENSION LIMIT - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2, (TAC NO. MB1745)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 137 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2. This amendment consists of changes to the Technical Specifications in response to your request dated August 23, 1991.

The amendment removes the Technical Specification 4.0.1c requirement which limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's next bi-weekly Federal Register notice.

Sincerely,
Original signed by:
Ngoc Le for:
Ronnie H. Lo, Senior Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 137 to DPR-23
- 2. Safety Evaluation

cc w/enclosures:
See next page

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AMENDMENT NO. 137 TO FACILITY OPERATING LICENSE NO. DPR-23 - ROBINSON,
UNIT NO. 2

Docket File

NRC PDR
Local PDR
PDII-1 Reading
S. Varga (14E4)
E. Adensam
P. Anderson
R. Lo
K. Bristow
OGC
D. Hagan (MNBB 3302)
E. Jordan (MNBB 3302)
G. Hill (4) (P1-37)
Wanda Jones (P-130A)
C. Grimes (11D3)
H. Silver
T. Dunning
ACRS (10)
GPA/PA
OC/LFMB
L. Reyes, RII

cc: Robinson Service List

ATTACHMENT TO LICENSE AMENDMENT NO. 137

FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove Pages

4.1-1
4.1-1a

Insert Pages

4.1-1
4.1-1a



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 137
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company (the licensee), dated August 23, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 3.B. of Facility Operating License No. DPR-23 is hereby amended to read as follows:

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B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 137, are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance:

Mr. L. W. Eury
Carolina Power & Light Company

H. B. Robinson Steam Electric
Plant, Unit No. 2

cc:

Mr. H. Ray Starling
Manager - Legal Department
Carolina Power & Light Company
P. O. Box 1551
Raleigh, North Carolina 27602

Mr. Dayne H. Brown, Director
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Health and Natural Resources
Division of Radiation Protection
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Mr. H. A. Cole
Special Deputy Attorney General
State of North Carolina
P. O. Box 629
Raleigh, North Carolina 27602

Mr. Robert P. Gruber
Executive Director
Public Staff - NCUC
P. O. Box 29520
Raleigh, North Carolina 27626-0520

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
H. B. Robinson Steam Electric Plant
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Hartsville, South Carolina 29550

Mr. C. R. Dietz
Manager, Robinson Nuclear Project
Department
H. B. Robinson Steam Electric Plant
P. O. Box 790
Hartsville, South Carolina 29550

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street
Suite 2900
Atlanta, Georgia 30323

Mr. Heyward G. Shealy, Chief
Bureau of Radiological Health
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. R. Morgan
General Manager
H. B. Robinson Steam Electric Plant
P. O. Box 790
Hartsville, South Carolina 29550

4.0 SURVEILLANCE REQUIREMENTS

Specified intervals may be adjusted plus or minus 25% to accommodate normal test schedules. Performance of any surveillance test outlined in these specifications is not required when the system or component is out of service as permitted by the Limiting Conditions for Operation. Prior to returning the system to service, the specified calibration and testing surveillance shall be performed.

4.0.1 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g) (6) (i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

Basis

The provisions of this specification establish the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified

with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 137 TO FACILITY OPERATING LICENSE NO. DPR-23
CAROLINA POWER & LIGHT COMPANY
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated August 23, 1991, the Carolina Power & Light Company (CP&L or the licensee) proposed a change to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed change removes the provision of TS 4.0.1c that limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to the TS was provided to all power reactor licensees and applicants by Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the of the 3.25 Limit on Extending Surveillance Intervals," dated August 21, 1989.

2.0 EVALUATION

Technical Specification 4.0 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.1c further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

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Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25-percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit.

In view of these considerations, the staff concluded that Specification 4.0.1c should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. This conclusion is consistent with the guidance provided in Generic Letter 89-14.

In addition, the Bases of this specification were updated to reflect this change and noted that it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified.

The licensee has proposed changes to Specification 4.0.1c that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the above change to the TS for H. B. Robinson Steam Electric Plant, Unit No. 2 is acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of South Carolina official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (October 30, 1991 at 56 FR 55943). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Thomas G. Dunning
Karla K. Bristow

Date: December 10, 1991