

November 12, 1998

Mr. D. E. Young, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: ISSUANCE OF AMENDMENT NO. 180 TO FACILITY OPERATING LICENSE
NO. DPR-23 REGARDING H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2 -
AMENDMENT FOR TECHNICAL SPECIFICATION CHANGE TO REFUELING
OPERATIONS-NUCLEAR INSTRUMENTATION (TAC NO. MA1232)

Dear Mr. Young:

The Commission has issued the enclosed Amendment No. 180 to Facility Operating License
No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR). This amendment
consists of changes to the Technical Specifications (TS) in response to your application dated
March 6, 1998, as supplemented by letter dated September 11, 1998.

This amendment revises TS 3.9.2 relating to the use of Post-Accident Monitoring (PAM) Source
Range (SR) neutron flux detectors as a compensatory measure in the event that one of the two
required BF3 neutron flux detectors becomes inoperable during Mode 6 operations (refueling).
A copy of the Safety Evaluation is also enclosed.

You are requested to inform the staff in writing when you have implemented the provisions of
this amendment.

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

Sincerely,

Original signed by:

Ram Subbaratnam, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

1. Amendment No. 180 to License No. DPR-23
2. Safety Evaluation

cc w/encls: See next page

*See previous concurrence

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PM:PDII-3 <i>RAM</i>	LA:PDII-2 <i>ED</i>	SRXB/DSSA	TSB <i>WDB</i>	OGC <i>AS</i>	PD:PDII-3
RSubbaratnam	EDunnington*	A.Attard*	W.D.Beckner	<i>R. Beckner</i>	FHebdon
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Original signed by:

Ram Subbaratnam, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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PM:PDII-3 <i>Ram</i>	LA:PDII-2 <i>ED</i>	SRXB/DSSA	TSB <i>wob</i>	OGC <i>RS</i>	PD:PDII-3
RSubbaratnam	EDunnington*	A.Attard*	W.D.Beckner	<i>R Subbaratnam</i>	FHebdone
10/2/98	10/20/98	9/25/98	10/17/98	10/19/98	11/12/98
Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 12, 1998

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You are requested to inform the staff in writing when you have implemented the provisions of this amendment.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ram Subbaratnam", written over a horizontal line.

Ram Subbaratnam, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

1. Amendment No. 180 to License No. DPR-23
2. Safety Evaluation

cc w/encls: See next page

AMENDMENT NO. 180 WFO FACILITY OPERATING LICENSE WFO. DPR-23 - H.B. Robinson,
UNIT 2

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T. Tjader

G. Hill (2)

R. Subbaratnam

ACRS

OPA

OC/LFDCB

L. Plisco, RII

cc: H. B. Robinson 2 Service List

AMENDMENT NO. 180 ~~NO~~ FACILITY OPERATING LICENSE ~~NO~~ DPR-23 - H.B. Robinson,
UNIT 2

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cc: H. B. Robinson 2 Service List

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Plant, Unit No. 2

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Hartsville, South Carolina 29550



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.180
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Carolina Power & Light Company (the licensee), dated March 6, 1998, as supplemented on September 11, 1998, 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 2.C.(2) of Facility Operating License No. DPR-23 is hereby amended to read as follows:

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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 180 , 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 and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 12, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 180

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

3.9-2
3.9-3
B 3.9-5
B 3.9-6
B 3.9-7
B 3.9-7a

Insert Pages

3.9-2
3.9-3
B 3.9-5
B 3.9-6
B 3.9-7
B 3.9-7a

3.9 REFUELING OPERATIONS

3.9.2 Nuclear Instrumentation

LCO 3.9.2 Two source range neutron flux monitors shall be OPERABLE.

APPLICABILITY: MODE 6.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required source range neutron flux monitor inoperable.	A.1 Verify one Post Accident Monitor (PAM) source range neutron flux monitor provides indication in the Control Room.	15 minutes
	<u>AND</u> A.2 Log indicated PAM source range neutron monitor count rate.	30 minutes <u>AND</u> Once per 30 minutes thereafter
B. Required Actions and Completion Times of Condition A not met.	B.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> B.2 Suspend positive reactivity additions.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two required source range neutron flux monitors inoperable.	C.1 Initiate action to restore one source range neutron flux monitor to OPERABLE status.	Immediately
	<u>AND</u>	
	C.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	C.3 Suspend positive reactivity additions.	Immediately
	<u>AND</u>	
	C.4 Perform SR 3.9.1.1.	4 hours
		<u>AND</u>
		Once per 12 hours thereafter

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.2.1 Perform CHANNEL CHECK.	12 hours
SR 3.9.2.2NOTE..... Neutron detectors are excluded from CHANNEL CALIBRATION. Perform CHANNEL CALIBRATION.	18 months

B 3.9 REFUELING OPERATIONS

B 3.9.2 Nuclear Instrumentation

BASES

BACKGROUND

The source range neutron flux monitors are used during refueling operations to monitor the core reactivity condition. The installed source range neutron flux monitors are part of the Nuclear Instrumentation System (NIS). These detectors are located external to the reactor vessel and detect neutrons leaking from the core.

The installed source range neutron flux monitors are BF3 detectors operating in the proportional region of the gas filled detector characteristic curve. The detectors monitor the neutron flux in counts per second. The instrument range covers six decades of neutron flux ($1E+6$ cps) with a 5% instrument accuracy. The detectors also provide continuous visual indication in the control room and an audible alarm to alert operators to a possible dilution accident. The NIS is designed in accordance with the criteria presented in the UFSAR Section 3.1 (Ref. 1).

APPLICABLE SAFETY ANALYSES

Two OPERABLE source range neutron flux monitors are required to provide a signal to alert the operator to unexpected changes in core reactivity such as with a boron dilution accident (Ref. 2) or an improperly loaded fuel assembly.

The source range neutron flux monitors satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO requires that two source range neutron flux monitors be OPERABLE to ensure that redundant monitoring capability is available to detect changes in core reactivity. For the purposes of this LCO, OPERABILITY of the source range flux monitors includes both channels with continuous visual count rate indication in the control room, and one channel with audible count rate indication available in the containment.

(continued)

BASES (continued)

APPLICABILITY In MODE 6, the source range neutron flux monitors must be OPERABLE to determine changes in core reactivity. There are no other direct means available to check core reactivity levels. In MODES 2, 3, 4, and 5, these same installed source range detectors and circuitry are also required to be OPERABLE by LCO 3.3.1, "Reactor Protection System (RPS) Instrumentation."

ACTIONS

A.1 and A.2

With only one required source range neutron flux monitor OPERABLE, an OPERABLE Post Accident Monitor (PAM) source range neutron monitor may be used to provide the required redundancy. Required Action A.1 ensures that the PAM source range neutron monitor is indicating in the control room. Since the PAM source range neutron monitor provides only visual indication of count rate in the Control Room and has no audible count rate capability, Required Action A.2 requires that the indicated count rate from the PAM source range neutron monitor be logged within 30 minutes and once per 30 minutes thereafter. The Completion Times are reasonable considering that there remains one OPERABLE source range monitor with audible count rate and alarm function, and recognition of the time required to complete manual operator actions in response to the boron dilution event.

B.1 and B.2

If the Required Actions and Completion Times of Condition A are not met, redundant means of monitoring core reactivity conditions are not assured. CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action B.1 shall not preclude completion of movement of a component to a safe position.

C.1, C.2, and C.3

With no source range neutron flux monitor OPERABLE, action to restore a monitor to OPERABLE status shall be initiated immediately. Once initiated, action shall be continued

(continued)

BASES (continued)

ACTIONS

C.1, C.2, and C.3 (continued)

until a source range neutron flux monitor is restored to OPERABLE status. Since the source range neutron monitors are the only direct means of monitoring core reactivity conditions, CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action C.2 shall not preclude completion of a component to a safe condition.

C.4

With no source range neutron flux monitor OPERABLE, there are no direct means of detecting changes in core reactivity. However, since CORE ALTERATIONS and positive reactivity additions are not to be made, the core reactivity condition is stabilized until the source range neutron flux monitors are OPERABLE. This stabilized condition is determined by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

The Completion Time of 4 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration. The Frequency of once per 12 hours ensures that unplanned changes in boron concentration would be identified. The 12 hour Frequency is reasonable, considering the low probability of a change in core reactivity during this time period.

SURVEILLANCE
REQUIREMENTS

SR 3.9.2.1

SR 3.9.2.1 is the performance of a CHANNEL CHECK, which is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that the two indication channels should be consistent with core conditions. Changes in fuel loading and core geometry can result in significant differences between source range channels, but each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.1.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.9.3.2

SR 3.9.2.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. The CHANNEL CALIBRATION for the PAM source range neutron flux monitors only applies to the portion of the channel applicable to providing visual indication of neutron count rate in the Control Room. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. UFSAR, Section 3.1.
 2. UFSAR, Section 15.4.6.
-
-



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 180 TO FACILITY LICENSE NO. DPR-23

CAROLINA POWER & LIGHT COMPANY

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

DOCKET NO. 50-261

1.0 BACKGROUND

By letter dated March 6, 1998, as supplemented September 11, 1998, Carolina Power & Light Company (CP&L) requested Technical Specifications (TS) changes to permit the use of the post-accident monitoring (PAM) source range (SR) neutron flux detector as a compensatory measure in the event that one of the two required BF3 neutron flux detectors become inoperable during Mode 6 operations (refueling). The September 11, 1998, submittal contained clarifying information only, and did not change the no significant hazards consideration determination.

Specifically, the proposed change would modify TS Section 3.9.2, "Instrumentation," to allow core alterations and positive reactivity changes to continue, if one SR neutron flux monitor and PAM SR neutron flux monitor with control room indication is available, and if count rates from this indication are logged once every 30 minutes.

The Reactor Systems Branch (SRXB) review covered the neutronics and instrumentation aspects of this submittal. The Technical Specifications (TS) changes were reviewed independently by the TS Branch.

2.0 DISCUSSION AND EVALUATION

During refueling (Mode 6), two operable BF3 SR monitors are required to provide redundancy during fuel movement or other actions that may cause positive reactivity changes, including removal of upper internal components. The proposed change would permit the use of the alternate PAM SR monitor in place of the primary BF3 SR neutron flux monitor. The change allows a PAM SR neutron flux monitor to be credited as a compensatory measure by providing indication redundancy for monitoring core reactivity in conjunction with the second BF3 SR neutron flux monitor.

The proposed change will maintain two BF3 SR monitors for visually monitoring core reactivity as currently discussed in the Bases for the affected TS. Audible indication provided by one BF3

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SR monitor will still be required and will continue to be fulfilled by the remaining BF3 SR monitor. The PAM SR monitor is a fission chamber detector which has a sensitivity of 4 cps/neutron-volts (cps/nv) for thermal neutrons and a sensitivity of 2 cps/nv for fast neutrons. The BF3 SR monitor, on the other hand, has a sensitivity of 9 cps/nv. The PAM SR monitor has a comparable range and accuracy (i.e., range of 1 E-01 cps to 1 E+5 cps with an accuracy of 2% of full scale) to that of the BF3 SR monitor (i.e., range of 1 E-00 cps to 1 E+6 cps with an accuracy of 3% of full scale). Although the PAM SR monitor does not have the ability to provide audible count rate indication, the current TS require only one channel with audible count rate indication in the containment and the control room. This requirement will continue to be satisfied by the remaining BF3 SR monitor, and thus meets the TS Section 3.9.2 Bases requirements of six decades of indication and 5% accuracy. The licensee is required to perform a channel check every 12 hours as per Surveillance Requirement 3.9.2.1, to ensure that the BF3 SR monitor is functioning according to design specifications. Since the H. B. Robinson's original licensing bases did not include the single failure criteria regarding the SR detectors, this amendment conforms with the original licensing bases.

This proposed change to the TS would result in a reduction in the redundancy of alarming capabilities since the PAM SR monitor does not have this capability. To compensate this reduction in redundancy of alarming capabilities, the proposed Required Actions would require compensatory measures in the form of logging the PAM SR indicated neutron flux every half hour. Also, redundant monitoring capabilities for core reactivity are available via administrative controls and physical limitations imposed on fuel handling operations, including a minimum of two visual control room indicators and an audible indication in the containment from the remaining BF3 SR monitor. Thus, this loss of redundancy is not considered to result in significant safety concerns and the changes to Required Actions and Bases adequately incorporate these changes to TS Section 3.9.2 and, therefore, are acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the 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 (63 FR 30262). 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 this 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.

On the basis of the review described above, the staff finds acceptable the proposed changes to the H. B. Robinson Unit 2 TS 3.9.2 to allow the use of alternate SR detectors when one of the primary source range detectors (BF3) is inoperable.

Principal Contributors: A. Attard and Ram Subbaratnam.

Date: November 12, 1998