February 26, 1998

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

SUBJECT: CORRECTIONS TO BASES FOR IMPROVED TECHNICAL SPECIFICATIONS, H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 (TAC NO. M96440)

Dear Mr. Keenan:

In a letter dated November 7, 1997, the NRC issued Bases to the Improved Technical Specifications (ITS) to Facility Operating License (FOL) No. DPR-23 for the H. B. Robinson Steam Electric Station, Unit No. 2. The ITS were issued as Amendment 176 to the license on October 24, 1997, and replaced the then-current TS (CTS) and associated Bases with a set of ITS based on NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 0, dated September 1992.

Upon review of the completed amendment, your staff discovered several minor concerns with the as-issued Bases. Pages B3.3-43, B3.3-131, B3.4-26 and B3.4-27 were either inadvertently omitted or were issued with printing flaws as a result of mechanical errors during the reproduction process prior to issuance. Correct and clean versions of the above pages are enclosed.

If you have any questions on this matter, please do not hesitate to contact me at (301) 415-1428.

Sincerely,

Original Signed by:
Joseph W. Shea, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: TS Pages B3.3-43, B3.3-131, B3.4-26 and B3.4-27

cc w/encl.: See next page

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NAME	EDunnington ED	JShea JWS	PTKuo PTK			
DATE	2/26/98	2/12/98	2/12/98			

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

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cc:

Mr. William D. Johnson
Vice President and Senior Counsel
Carolina Power & Light Company
Post Office Box 1551
North Carolina 27602

Ms. Karen E. Long
Assistant Attorney General
State of North Carolina
Post Office Box 629
Raleigh, North Carolina 27602

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
H. B. Robinson Steam Electric Plant
2112 Old Camden Road
Hartsville, South Carolina 29550

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, Georgia 30303

Mr. J. W. Moyer
Plant General Manager
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

Public Service Commission
State of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Mr. H. K. Chernoff
Supervisor, Licensing/Regulatory Programs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

Mr. Mel Fry, Acting Director
N.C. Department of Environment,
Health and Natural Resources
Division of Radiation Protection Raleigh,
3825 Barrett Dr.
Raleigh, North Carolina 27609-7721

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

Mr. Max Batavia, Chief
South Carolina Department of Health
Bureau of Radiological Health
and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Ms. D. B. Alexander
Manager
Performance Evaluation and
Regulatory Affairs
Carolina Power & Light Company
412 S. Wilmington Street
Raleigh, North Carolina 27601

Mr. Milton Shymlock
U. S. Nuclear Regulatory Commission
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Mr. T. M. Wilkerson
Manager - Regulatory Affairs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550-0790

BASES

ACTIONS

0.1 and 0.2 (continued)

within 6 hours. If the channel cannot be restored to OPERABLE status within the 6 hours, then THERMAL POWER must be reduced below the P-8 setpoint within the next 4 hours. This places the unit in a MODE where the LCO is no longer applicable. This Function does not have to be OPERABLE below the P-8 setpoint because other RPS Functions provide core protection below the P-8 setpoint. The 6 hours allowed to restore the channel to OPERABLE status and the 4 additional hours allowed to reduce THERMAL POWER to below the P-8 setpoint are justified in Reference 7.

P.1 and P.2

Condition P applies to Turbine Trip on Low Auto-Stop Oil Pressure or on Turbine Stop Valve Closure. With one channel inoperable, the inoperable channel must be placed in the trip condition within 6 hours. If placed in the tripped condition, this results in a partial trip condition requiring only one additional channel to initiate a reactor trip. If the channel cannot be restored to OPERABLE status or placed in the trip condition, then power must be reduced below the P-7 setpoint within the next 4 hours. The 6 hours allowed to place the inoperable channel in the tripped condition and the 4 hours allowed for reducing power are justified in Reference 7.

Q.1 and Q.2

Condition Q applies to the SI Input from ESFAS reactor trip and the RPS Automatic Trip Logic in MODES 1 and 2. These actions address the train orientation of the RPS for these Functions. With one train inoperable, 6 hours are allowed to restore the train to OPERABLE status (Required Action Q.1) or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 6 hours (Required Action Q.1) is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function and given the low probability of an event during this interval. The Completion Time of 6 hours (Required Action Q.2) is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems.

(continued)

BASES

ACTIONS (continued)

B.1

Condition B applies to the failure of two CREFS actuation trains, or the radiation monitor channel. The Required Action is to place one CREFS train in the emergency pressurization mode of operation immediately. This accomplishes the actuation instrumentation Function that may have been lost and places the unit in a conservative mode of operation.

C.1 and C.2

Condition C applies when the Required Action and associated Completion Time for Condition A or B have not been met and the unit is in MODE 1, 2, 3, or 4. The unit must be brought to a MODE in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1 and D.2

Condition D applies when the Required Action and associated Completion Time for Condition A or B have not been met during CORE ALTERATIONS or when irradiated fuel assemblies are being moved. Movement of irradiated fuel assemblies and CORE ALTERATIONS must be suspended immediately to reduce the risk of accidents that would require CREFS actuation.

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.7-1 determines which SRs apply to which CREFS Actuation Functions.

SR 3.3.7.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of radiation monitor instrumentation has not occurred.

(continued)

BASES

LCO (continued)

described in item c.4 of the Note, is to maintain SDM within the MODE 3 limit for no RCS loops in operation as specified in the COLR. This SDM limit is sufficient to prevent a return to criticality in the event of simultaneous withdrawal of the two most reactive control rod banks as assumed in the inadvertent control rod transient analysis.

An OPERABLE RCS loop consists of one OPERABLE RCP and one OPERABLE SG in accordance with the Steam Generator Tube Surveillance Program, which has the minimum water level specified in SR 3.4.5.2. An RCP is OPERABLE if it is capable of being powered and is able to provide forced flow if required.

APPLICABILITY

In MODE 3, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. The most stringent condition of the LCO, that is, two RCS loops OPERABLE and two RCS loops in operation, applies to MODE 3 with RTBs in the closed position. The least stringent condition, that is, two RCS loops OPERABLE and one RCS loop in operation, applies to MODE 3 with the RTBs open.

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops – MODES 1 and 2";
LCO 3.4.6, "RCS Loops – MODE 4";
LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

ACTIONS

A.1

If one required RCS loop is inoperable, redundancy for heat removal is lost. The Required Action is restoration of the required RCS loop to OPERABLE status within the Completion Time of 72 hours. This time allowance is a justified period to be without the redundant, nonoperating loop because a

(continued)

BASES

ACTIONS

A.1 (continued)

single loop in operation has a heat transfer capability greater than that needed to remove the decay heat produced in the reactor core and because of the low probability of a failure in the remaining loop occurring during this period.

B.1

If restoration is not possible within 72 hours, the unit must be brought to MODE 4. In MODE 4, the unit may be placed on the Residual Heat Removal System. The additional Completion Time of 12 hours is compatible with required operations to achieve cooldown and depressurization from the existing plant conditions in an orderly manner and without challenging plant systems.

C.1

With the requirements of the LCO not met for reasons other than Conditions A or D (i.e., one of the two required RCS loops not in operation and the requirements of LCO 3.4.5 item a, b, c, or d not met), an additional RCS loop must be restored to operation within 1 hour. Should a power excursion occur due to an inadvertent control rod withdrawal transient with one of the two required RCS loops not in operation and the requirements of LCO 3.4.5 item a, b, c, or d not satisfied, the accident analysis limits may be exceeded. Therefore, only a limited time is allowed to restore an additional RCS loop to operation. Alternatively, if the requirements of the LCO 3.4.5 item a, b, c, or d are met, operation with only one RCS loop in operation would satisfy the requirements of the LCO and ensure that the possibility of a power excursion associated with an inadvertent control rod withdrawal transient is precluded. The 1 hour Completion Time is adequate to perform these operations in an orderly manner without exposing the unit to risk for an undue period of time.

(continued)