

December 21, 1977

Docket No.: 50-261

Carolina Power & Light Company
ATTN: Mr. J. A. Jones
Senior Vice President
336 Fayetteville Street
Raleigh, North Carolina 27602

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Gentlemen:

The Commission has issued the enclosed Amendment No. 29 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant Unit No. 2. The amendment consists of changes to the Technical Specifications in response to your applications dated September 9 and November 4, 1977.

This amendment revises the reporting requirements to allow the use of improved Licensee Event Report and Monthly Operating Report formats. This amendment also deletes the requirement for an Annual Operating Report while retaining the requirement that occupational exposure data be reported on an annual basis. Furthermore, this amendment deletes the requirements concerning respiratory protection, as they are now stipulated in 10 CFR 52.103.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Enclosures:

1. Amendment No. 29
2. Safety Evaluation
3. Notice

cc w/enclosures: See next page

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Carolina Power & Light Company

cc w/enclosure(s):

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Washington, D. C. 20036

Hartsville Memorial Library
Home and Fifth Avenue
Hartsville, South Carolina 29550

Mr. McCuen Morrell, Chairman
Darlington County Board of Supervisors
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Chief, Energy Systems
Analyses Branch (AW-459)
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U. S. Environmental Protection Agency
Region IV Office
ATTN: EIS COORDINATOR
245 Courtland Street, NE
Atlanta, Georgia 30308

cc w/enclosures and incoming

dtd.: 9/9/77 & 11/4/77

Office of Intergovernmental Relations
116 West Jones Street
Raleigh, North Carolina 27603



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. 29
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment by Carolina Power & Light Company (the licensee) dated September 9 and November 4, 1977, comply 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 applications, 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:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 29, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment becomes effective December 29, 1977.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 21, 1977

ATTACHMENT TO LICENSE AMENDMENT NO. 29

FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Revise Appendix A Technical Specifications as follows:

Remove Pages

6-14 - 6-23

6-25 - 6-28

6-30 - 6-33

Insert Pages

6-14 - 6-23

6-25 - 6-26

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Existing page 6-29 should be renumbered 6-27. The changed areas on the revised pages are shown by marginal lines.

- d. The Safety Limit Violation Report shall be submitted to the Commission, the Manager of Corporate Nuclear Safety and the Manager, Nuclear Generation within 14 days of the violation.

6.8 Procedures

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33 dated 11/3/72 except as provided in 6.8.2 and 6.8.3 below.

6.8.2 Proposed operating procedures, overall plant operating procedures, system descriptions, emergency procedures, fuel handling procedures, periodic test procedures, procedures for equipment maintenance which may affect nuclear safety, annunciator procedures and any other procedures determined by the Plant Manager to affect nuclear safety, shall be reviewed by the PNSC and approved by the Plant Manager. Prior to implementation, proposed changes to these procedures must also be reviewed and approved in this manner.

6.8.3 Temporary changes to procedures of 6.8.2 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License.
- c. The change is documented, reviewed by the PNSC and approved by the Plant Manager within three weeks of implementation.

Information to be reported to the Commission, in addition to the reports required by Title 10, Code of Federal Regulations, shall be as indicated in the following sections. Reports shall be addressed to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

6.9.1 Routine Reports

- a. Startup Report. A summary report of plant startup and power escalation shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

b. Annual Report

Prior to March 1 of each year a report shall be submitted which provides a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, ^{1/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific work functions.

^{1/} This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

- c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management Information and Program Control, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the NRC Regional Office, to be submitted no later than the fifteenth of each month following the calendar month covered by the report.

6.9.2 Reportable Occurrences

The Reportable Occurrences of Specifications 6.9.2.a and 6.9.2.b below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of the occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference made to the original report date.

- a. Prompt Notification With Written Followup. The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the appropriate Regional Office of Inspection and Enforcement or his designate no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of the licensee event report form.

Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- (1) Failure of the reactor protection system, or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the Technical Specifications or failure to complete the required protective function.

Note: Instrument drift discovered as a result of testing need not be reported under this item (but see 6.9.2.a(5), 6.9.2.a(6), and 6.9.2.b(1) below.

- (2) Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications.

Note: If specified action is taken when a system is found to be operating between the most conservative and least conservative aspects of a limiting condition for operation listed in the Technical Specifications, the limiting condition for operation is not considered to have been violated and no report need be submitted under this section (but see 6.9.2.b(2) below).

- (3) Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary or primary containment.

Note: Leakage of valve packing or gaskets within the limits for identified leakage set forth in Technical Specifications need not be reported under this section.

(4) Reactivity anomalies involving disagreement with predicted value of reactivity balance under steady state conditions during power operation greater than or equal to 1% $\Delta k/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the Technical Specifications; short-term reactivity increases that correspond to a reactor startup rate greater than 5 dpm, or if subcritical, an unplanned reactivity insertion of more than 0.5% $\Delta k/k$; or any unplanned criticality.

(5) Failure or malfunction to one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.

(6) Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.

Note: For 6.9.2.a(5) and 6.9.2.a(6) reduced redundancy that does not result in loss of system function need not be reported under this section (but see 6.9.2.b(2) and 6.9.2.b(3) below).

(7) Conditions arising from natural or man-made events that, as a direct result of the event, require plant shutdown, operation of safety systems, or other protective measures required by Technical Specifications.

(8) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the Technical Specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.

- (9) Performance of structures, systems or component that require remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or Technical Specifications bases or discovery during plant life of conditions not specifically considered in the safety analysis report or Technical Specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

Note: This item is intended to provide for reporting of potentially generic problems.

- b. Thirty-day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the Director of the appropriate NRC Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of the licensee event report form, used for entering data into the NRC's computer-based file of information concerning licensee events. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

(1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems (but see 6.9.2.a(1) and 6.9.2.a(2) above).

(2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation (but see 6.9.2.a(2) above).

Note: Routine surveillance testing, instrument calibration or preventive maintenance which

required system configurations as described in 6.9.2.b(1) and 6.9.2.b(2) above need not be reported except where test results themselves reveal a degraded mode as described above.

(3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems (but see 6.9.2.a(6) above).

(4) Abnormal degradation of systems other than those specified in 6.9.2.a(3) above designed to contain radioactive material resulting from the fission process.

Note: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limits for identified leakage set forth in Technical Specifications need not be reported under this item.

6.9.3

Special Reports

Special reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

	<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
a.	Containment Leak Rate Testing	4.4	Upon completion of each test
b.	Initial Containment Structural Test	4.4	Within three months following completion of test
c.	Fuel Inspection	2.1	Upon completion of the inspection at second and third refueling outages

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|----|--|-----|--|
| d. | Inservice Inspection | 4.2 | After five years of operation |
| e. | Containment Sample Tendon Surveillance | 4.4 | Upon completion of the inspection at 5 and 25 years of operation |
| f. | Post-operational Containment Structural Test | 4.4 | Upon completion of the test at 3 and 20 years of operation |

6.10 Record Retention

6.10.1 The following records shall be retained for at least five years:

- a. Records of facility operation covering time interval at each power level.

- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PNSC and the CNSC.

6.11 Radiation Protection Program

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 Deleted

6.13 High Radiation Area

6.13.1. In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 29 TO FACILITY OPERATING LICENSE NO. DPR-23

CAROLINA POWER AND LIGHT COMPANY

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

DOCKET NO. 50-261

Introduction

Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications", is the basis for reporting requirements found in Technical Specifications today. When these Technical Specifications were issued we requested that licensees use the formats in the guide for the Licensee Event Report (LER) and Monthly Operating Report. In some cases licensees' use of these formats was required by a reference to Regulatory Guide 1.16 in the Technical Specifications. After two years of experience with the reporting requirements identified in this guide we reviewed the scope of information licensees are required to submit in the LER, Annual Operating Report, Monthly Operating Report and Startup Report.

Based on our review of LER's we developed a modified format for the LER to make this document more useful for evaluation purposes. By letters sent in July and August 1977, we informed licensees of the new LER format and requested that they use it. For those licensees who reference Regulatory Guide 1.16 in their Technical Specifications we also requested that they propose a change which would replace this reference with appropriate words from the guide and which would delete mandatory use of the reporting forms contained in the guide.

From our review of all licensee reports we determined that much of the information found in the Annual Operating Report either is addressed in the LER's or Monthly Operating Reports, which are submitted in a more timely manner, or could be included in these reports with only a slight augmentation of the information already supplied. Therefore we concluded that the Annual Operating Report could be deleted as a Technical Specification requirement if certain additional information were provided in the Monthly Operating Reports. As a result we sent letters during September 1977 to licensees informing them that a revised and improved format for Monthly Operating Reports was available and requested that they use it. For those licensees with the Technical Specification reference to Regulatory

Guide 1.16 the change deleting this reference, discussed above, would be necessary. In addition, licensees were informed that if they agreed to use the revised format they should submit a change request to delete the requirement for an Annual Operating Report except that occupational exposure data must still be submitted.

By letter dated September 9, 1977, Carolina Power and Light Company (the licensee) requested revision of the Technical Specifications for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson-2). The revision would permit use of LER and Monthly Operating Report formats different from those contained in Regulatory Guide 1.16. By letter dated November 4, 1977, the licensee further requested revision of the Robinson-2 Technical Specifications to delete the requirement for submission of an Annual Operating Report, except for occupational exposure data.

On another subject involving the Robinson-2 Technical Specifications, by letter dated July 28, 1977, we advised the licensee that pursuant to 10 CFR 20.103(c) and (f), if he desired to receive credit for use of respiratory protective equipment at Robinson-2 after December 28, 1977, such use must be as stipulated in Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection," rather than as specified in the current Technical Specifications. We also noted that based on the revocation of the current Technical Specifications on respiratory protection, and in the absence of written objection by the licensee, we would delete the current Technical Specifications on respiratory protection in an amendment approved after December 28, 1977. Having received no written objection from the licensee, we are making that deletion at this time.

Evaluation

The proposed change which would replace the reference to RG 1.16 with appropriate wording from that guide is administrative in nature and does not change the operation of the reactor. This change provides wording in the Technical Specifications which identifies the required reports, states the circumstances under which they should be submitted and details the timing of such submittals. The text does not specify in great detail the format and content of the reports as was previously done by reference to the guide. The proposed change provides greater flexibility to accommodate changes to the reporting system and allows the licensee to use the recently revised LER and Monthly Operating Report formats and is therefore acceptable.

The licensee has also proposed to delete all but one of the four specified items in the Annual Operating Report. The report which tabulates occupational exposure on an annual basis is needed and therefore, the requirement to submit this information has been retained. We have determined that the failed fuel examination information does not need to be supplied routinely by licensees because this type of historical data can be obtained in a compiled form from fuel vendors when needed. The information concerning forced reductions in power and outages will be supplied in the revised Monthly Operating Reports and the narrative summary of operating experience will be provided on a monthly basis in the Monthly Operating Report rather than annually. The licensee has committed to use the revised Monthly Operating Report format beginning with their report for January 1978 as requested. We have concluded that all needed information will be provided and deletion of the Annual Operating Report is acceptable.

We have deleted the present Technical Specification 6.12 and Table 6.12-1 which deal with the respiratory protection program at Robinson-2 to eliminate conflict with 10 CFR 20.103, as revised November 29, 1976. Pursuant to 10 CFR 20.103(f), effective December 29, 1977, allowance may be made for the use of respiratory protective equipment only if its use is as stipulated in Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection." Provisions for deletion of the present specifications were included in Specification 6.12.3 at the time the Specifications were prepared based on the pending revision of 10 CFR 20.103. Based on providing conformance with the revised regulations, we find this change acceptable.

Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: December 21, 1977

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-261

CAROLINA POWER & LIGHT COMPANY

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 29 to Facility Operating License No. DPR-23, issued to Carolina Power & Light Company (the licensee), which revised Technical Specifications for operation of the H. B. Robinson Steam Electric Plant Unit No. 2 (the facility) located in Darlington County, Hartsville, South Carolina. The amendment becomes effective on December 29, 1977.

This amendment revises the reporting requirements to allow the use of improved Licensee Event Report and Monthly Operating Report formats. This amendment also deletes the requirement for an Annual Operating Report while retaining the requirement that occupational exposure data be reported on an annual basis. Furthermore, this amendment deletes the requirements concerning respiratory protection, as they are now stipulated in 10 CFR §20.103.

The applications for the amendment comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the applications for amendment dated September 9 and November 4, 1977, (2) the Commission's letter to the licensee dated July 28, 1977, (3) Amendment No. 29 to License No. DPR-23, and (4) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C. and at the Hartsville Memorial Library, Home and Fifth Avenues, Hartsville, South Carolina. A copy of items (2), (3), and (4) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland, this 21st day of December 1977.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors