



Serial: RNP-RA/02-0136

SEP 05 2002

United States Nuclear Regulatory Commission  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

RESPONSE TO REQUEST FOR ADDITIONAL  
INFORMATION ON TECHNICAL SPECIFICATIONS  
CHANGE REGARDING SELECTIVE IMPLEMENTATION  
OF ALTERNATIVE RADIOLOGICAL SOURCE TERM (TAC NO. MB4632)

Ladies and Gentlemen:

On March 13, 2002, in accordance with the provisions of the Code of Federal Regulations, Title 10 (10 CFR), Part 50.90, Carolina Power and Light (CP&L) Company submitted a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, that would modify the TS requirements for movement of irradiated fuel and performing core alterations. The basis for the proposed change is a reanalysis of the limiting Fuel Handling Accident (FHA) using an alternative source term (AST) in accordance with 10 CFR 50.67 and Regulatory Guide 1.183, Revision 0, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," dated July 2000.

During subsequent discussions with the NRC staff, additional information was identified as being needed to complete review of the proposed TS amendment. The HBRSEP, Unit No. 2, letter dated August 14, 2002, provided the requested information, including revised TS pages based on the guidance contained in Technical Specifications Task Force (TSTF) - 51, Revision 2.

On August 30, 2002, a discussion between the NRC staff and HBRSEP, Unit No. 2, identified the need for additional clarification regarding the proposed TS amendment. Attachment I provides an Affirmation as required by 10 CFR 50.30(b). The request for additional information and associated response are provided in Attachment II to this letter.

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In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of this response.

If you have any questions concerning this matter, please contact Mr. C. T. Baucom.

Sincerely,

  
B. L. Fletcher III  
Manager - Regulatory Affairs

CTB/cac

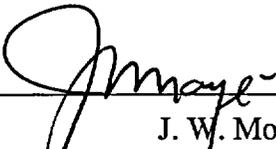
Attachments:

- I. Affirmation
  - II. Response to Request for Additional Information on Technical Specifications Change Regarding Selective Implementation of Alternative Radiological Source Term
- c: Mr. L. A. Reyes, NRC, Region II  
Mr. H. J. Porter, Director, Division of Radioactive Waste Management (SC)  
Mr. R. M. Gandy, Division of Radioactive Waste Management (SC)  
Mr. R. Subbaratnam  
NRC Resident Inspector, HBRSEP  
Attorney General (SC)

**AFFIRMATION**

The information contained in letter RNP-RA/02-0136 is true and correct to the best of my information, knowledge and belief; and the sources of my information are officers, employees, contractors, and agents of Carolina Power and Light Company. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: SEP 05 2002

  
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J. W. Moyer  
Vice President, HBRSEP, Unit No. 2

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
ON TECHNICAL SPECIFICATIONS CHANGE REGARDING SELECTIVE  
IMPLEMENTATION OF ALTERNATIVE RADIOLOGICAL SOURCE TERM**

**NRC Information Request**

On August 30, 2002, in a discussion with the NRC staff, it was determined that additional clarification is needed regarding the proposed Technical Specifications (TS) amendment to implement an alternative source term (AST) analysis for the design basis Fuel Handling Accident (FHA) in accordance with 10 CFR 50.67 and Regulatory Guide 1.183, Revision 0, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," dated July 2000. Specifically, the original H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, submittal dated March 13, 2002, included proposed TS changes that would have required manual operator action to be substituted for automatic actuation of the Control Room Emergency Filtration System (CREFS) in the event of the postulated fuel handling accident. Additional clarification is appropriate to describe the basis and approach for the proposed TS amendment.

**Response**

The HBRSEP, Unit No. 2, submittal dated March 13, 2002, included a proposed change to TS 3.3.7, "Control Room Emergency Filtration System (CREFS) Actuation Instrumentation," that requested to modify the APPLICABILITY of the CREFS actuation instrumentation to delete "movement of irradiated fuel assemblies" and during "CORE ALTERATIONS." The technical basis for this change was the AST analysis for the FHA that was performed in accordance with 10 CFR 50.67 and Regulatory Guide 1.183. The March 13, 2002, submittal, Attachment V, Table 3, "Control Room Ventilation Inputs," identifies as a key analysis input and assumption that one (1) hour is assumed for operator action to switch the CREFS from normal to pressurization mode. The results of this analysis demonstrate that control room doses are within the Regulatory Limits provided by 10 CFR 50.67 and 10 CFR 50, Appendix A, Criterion 19.

The HBRSEP, Unit No. 2, August 14, 2002, submittal proposes to retain "during movement of irradiated fuel" APPLICABILITY for the CREFS automatic actuation function. Therefore, the CREFS automatic actuation function will continue to be required operable during a postulated FHA. The TS changes as proposed in the August 14, 2002, submittal do not remove any TS operability requirements for automatic functions that would require substitution of manual operator action for the automatic function.

As noted above, the FHA analysis assumes that the control room ventilation system is placed in pressurization mode by operator action within one (1) hour. By maintaining the TS requirement for operability of the control room area radiation monitor, the CREFS automatic actuation function will remain available to place the CREFS in pressurization mode based on radiological conditions.