



Serial: RNP-RA/02-0155

OCT 04 2002

United States Nuclear Regulatory Commission  
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Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

ADDITIONAL INFORMATION IN SUPPORT OF 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. In a subsequent submittal dated August 14, 2002, the proposed license amendment request was revised based on the guidance contained in the approved Standard Technical Specifications Change Traveler, Technical Specification Task Force (TSTF)-51, Revision 2.

In order to meet the guidance contained in TSTF-51, Revision 2, H. B. Robinson Steam Electric Plant, Unit No. 2, commits to incorporate the following information into the shutdown safety procedures:

- During fuel handling/core alterations, the ability to filter and monitor releases will be maintained. In particular, the Containment Purge Filter System and associated radiation monitors will be available, but are not required to be operable.
- The ability to restore containment capability during fuel handling/core alterations will be maintained. A contingency method to promptly close external openings in the containment will be developed.
- When necessary, the station shift supervisor will ensure that necessary actions are taken to close external openings in the containment.

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The programmatic and procedural controls providing the capability to promptly close the containment during fuel handling/core alterations, for conditions that warrant closure, will be in place prior to implementation of the proposed license amendment.

An Affirmation as required by 10 CFR 50.30(b) is provided as an attachment to this letter.

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

CAC/cac

Attachment

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/02-0155 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: 10/4/02      C L Burton  
C. L. Burton  
Director - Site Operations, HBRSEP, Unit No. 2