



Serial: RNP-RA/04-0069

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United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

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

**REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
REGARDING ADMINISTRATIVE CONTROL UPDATES AND CORRECTIONS**

Ladies and Gentlemen:

In accordance with the provisions of the Code of Federal Regulations, Title 10, Part 50.90, Progress Energy Carolinas (PEC), Inc., also known as Carolina Power and Light Company, is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed amendment would modify the Administrative Control section of the TS to update terminology and to correct a typographical error.

The proposed amendment would revise Section 5.5.14, "Technical Specifications (TS) Bases Control Program," to replace the previous 10 CFR 50.59 term 'unreviewed safety question' with current terminology. The proposed amendment would also revise Section 5.7.1, "High Radiation Area," to add wording that was inadvertently deleted with the issuance of the Improved Standard Technical Specifications in Amendment No. 176.

Attachment I provides an Affirmation pursuant to 10 CFR 50.30(b).

Attachment II provides a description of the current condition and a description of the proposed change, a technical justification for the proposed change, a No Significant Hazards Consideration Determination, and an Environmental Impact Consideration.

Attachment III provides a markup of the TS pages.

Attachment IV provides retyped pages of the proposed TS.

In accordance with 10 CFR 50.91(b), PEC is providing the State of South Carolina with a copy of the proposed license amendment.

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

Sincerely,



Jan F. Lucas

Manager - Support Services - Nuclear

Attachments:

- I. Affirmation
- II. Request for Technical Specifications Change Regarding Administrative Control Updates And Corrections
- III. Markup of Technical Specifications Pages
- IV. Retyped Technical Specifications Pages

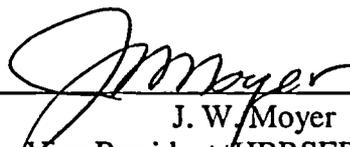
RAC/rac

c: Mr. T. P. O'Kelley, Director, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, NRC, Region II
Mr. C. P. Patel, NRC, NRR
NRC Resident Inspector, HBRSEP
Attorney General (SC)

AFFIRMATION

The information contained in letter RNP-RA/04-0069 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 Progress Energy Carolinas, Inc., also known as Carolina Power and Light Company. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 21 June 2001



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

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

REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE REGARDING ADMINISTRATIVE CONTROL UPDATES AND CORRECTIONS

Description of Current Condition and Proposed Change

Proposed change 1:

Technical Specifications (TS) 5.5.14 provides a description of the Technical Specifications Bases Control Program. Sub-section b of this program description states, "Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following: 1. a change in the TS incorporated in the license; or 2. a change to the updated FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59."

The proposed change for this section incorporates new terminology instituted in a change to 10 CFR 50.59 which became effective March 13, 2001. The new terminology replaces "unreviewed safety question" with the general terminology of "requires NRC approval."

Proposed change 2:

As currently written, the first paragraph of TS 5.7.1 states, "In lieu of the control device or alarm signal required by paragraph 20.1601(a) of 10 CFR 20, each High Radiation Area in which the intensity of radiation is 1000 mRem/hour or less shall be barricaded and conspicuously posted by requiring issuance of a Radiation Work Permit (RWP)."
The proposed change to this section corrects a typographical error that omitted the phrase, "...as a High Radiation Area and entrance thereto shall be controlled..."

Technical Justification

Proposed change 1 is based on a revision to 10 CFR 50.59, which became effective on March 13, 2001. The change does not fundamentally alter the requirement of the TS Bases Control Program. The TS 5.5.14 requirement for NRC review and approval of a Bases change is still determined through the use of the 10 CFR 50.59 review process.

Proposed change 2 provides a correction of a typographical error that was introduced during conversion to the Improved Standard Technical Specifications (ITS). The wording as proposed in this correction essentially restores the requirement to the phraseology approved in Amendment No. 152. There is no indication that the change to this wording was intentional during the processing of Amendment No. 176.

No Significant Hazards Consideration Determination

Progress Energy Carolinas, Inc., is proposing a change to the Appendix A, Technical Specifications, of Facility Operating License No. DPR-23, for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. This change revises Technical Specifications 5.5.14 and 5.7.1 and is related to updating and correction of these administrative controls.

An evaluation of the proposed change has been performed in accordance with 10 CFR 50.91(a)(1) regarding no significant hazards considerations using the standards in 10 CFR 50.92(c). A discussion of these standards as they relate to this amendment request follows:

1. **The Proposed Change Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.**

The proposed changes do not modify the facility or the procedures for operation of the facility. One change updates the terminology used in 10 CFR 50.59 evaluations. The change does not alter the requirement of the TS Bases Control Program. The requirement for NRC review and approval of a TS Bases change is still determined through the use of the 10 CFR 50.59 review process. The second change corrects a typographical error that occurred under Amendment No. 176. The wording as proposed in this correction restores the requirement to the phraseology approved in Amendment No. 152 and is consistent with existing plant procedures.

Since there are no changes to the facility or facility procedures, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident From Any Previously Evaluated.**

The proposed changes do not modify the facility or the procedures for operation of the facility. One change updates the terminology used in 10 CFR 50.59 evaluations. The change does not alter the requirement of the TS Bases Control Program. The requirement for NRC review and approval of a TS Bases change is still determined through the use of the 10 CFR 50.59 review process. The second change corrects a typographical error that occurred under Amendment No. 176. The wording as proposed in this correction restores the requirement to the phraseology approved in Amendment No. 152 and is consistent with existing plant procedures.

Since there are no changes to the facility or facility procedures, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. **The Proposed Change Does Not Involve a Significant Reduction in the Margin of Safety.**

The proposed changes continue to provide the controls necessary to ensure changes to the TS Bases are made in conformance with 10 CFR 50.59. The proposed changes continue to provide the controls necessary to ensure adequate control of High Radiation Areas. The proposed changes will not result in any changes to the facility or facility operating procedures. Therefore, the changes do not result in a significant reduction in the margin of safety.

Based on the above discussion, Progress Energy Carolinas, Inc., has determined that the requested change does not involve a significant hazards consideration.

Environmental Impact Consideration

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions for categorical exclusion for performing an environmental assessment. A proposed change for an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed change would not (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increases in the amounts of any effluents that may be released offsite; (3) result in a significant increase in individual or cumulative occupational radiation exposure. Progress Energy Carolinas, Inc., has reviewed this request and determined that the proposed change 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 needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

Progress Energy Carolinas, Inc., is proposing a change to the Appendix A, Technical Specifications, of Facility Operating License No. DPR-23, for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. This change revises Technical Specifications 5.5.14 and 5.7.1 and is related to updating and correction of administrative control wording to be consistent with current practices.

Basis

The proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in the No Significant Hazards Consideration Determination, the proposed change does not involve a significant hazards consideration.
2. The change is administrative in nature in that it corrects the Technical Specifications in order to make them consistent with existing requirements and procedures. The change will not result in any changes to the facility or facility procedures. Therefore, the

proposed change does not result in a significant change in the types or significant increases in the amounts of any effluents that may be released offsite.

3. The change is administrative in nature in that it corrects the Technical Specifications in order to make them consistent with existing requirements and procedures. The change will not result in any changes to the facility or facility procedures. The proposed change continues to provide the controls necessary to ensure adequate control of High Radiation Areas. The proposed wording for High Radiation Area controls is consistent with the phraseology approved in Amendment No. 152 and with existing procedures. Therefore, the proposed change does not result in a significant increase in individual or cumulative occupational radiation exposures.

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Attachment III to Serial: RNP-RA/04-0069
3 Pages (including cover page)

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

**REQUEST FOR TECHNICAL
SPECIFICATIONS CHANGE REGARDING
ADMINISTRATIVE CONTROL UPDATES AND CORRECTIONS**

MARKUP OF TECHNICAL SPECIFICATIONS PAGES

5.5 Programs and Manuals

5.5.13 Diesel Fuel Oil Testing Program (continued)

- b. Acceptability of fuel oil for use by testing the following parameters at a 31 day frequency:

API or specific gravity, viscosity, water and sediment, and cloud point.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program surveillance frequencies.

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides controls for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:
1. a change in the TS incorporated in the license; or
 2. a change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

Deleted: involves an unreviewed safety question as defined in

5.5.15 Safety Function Determination Program (SFDP)

This program provides controls to ensure loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

- 5.7.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a) of 10 CFR 20, each High Radiation Area in which the intensity of radiation is 1000 mRem/hour or less shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Radiation control personnel or personnel escorted by radiation control personnel shall be exempt from the RWP issuance requirements during the performance of their assigned duties within the RCA, provided they comply with approved radiation protection procedures for entry into High Radiation Areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device provided for each individual that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified as a radiation control technician with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the radiation control supervisor in the RWP.

- United States Nuclear Regulatory Commission
Attachment IV to Serial: RNP-RA/04-0069
3 Pages (including cover page)

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**REQUEST FOR TECHNICAL
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ADMINISTRATIVE CONTROL UPDATES AND CORRECTIONS**

RETYPE TECHNICAL SPECIFICATIONS PAGES

5.5 Programs and Manuals

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