



Serial: RNP-RA/08-0031

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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
AND WITHDRAWAL OF PROPOSED TECHNICAL SPECIFICATIONS
CHANGES TO SECTION 3.3.1, REACTOR PROTECTION SYSTEM INSTRUMENTATION

Ladies and Gentlemen:

In a letter dated November 29, 2007, Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), requested NRC review and approval of changes to modify the Technical Specifications (TS) requirements related to the interlock for the turbine trip input to the reactor protection system for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. An NRC request for additional information (RAI) pertaining to this amendment request was received by electronic mail transmission dated January 15, 2008.

In recent determinations pertaining to the upcoming refueling outage, it has been concluded that the proposed modification to the reactor protection system instrumentation will not be pursued. Therefore, this license amendment request is hereby withdrawn. The response to the RAI pertaining to this amendment request is provided to facilitate possible re-submittal of this license amendment request at a future date. A nuclear condition report (NCR) has been initiated in the HBRSEP, Unit No. 2, corrective action program that describes the circumstances associated with the withdrawal of this amendment request. The need to withdraw this amendment request was precipitated by the determination during the outage planning process that the upcoming refueling outage scope needed to be reduced.

Attachment I provides an Affirmation in accordance with the provisions of 10 CFR 50.30(b).

Attachment II provides the response to the NRC RAI for this license amendment request.

In accordance with 10 CFR 50.91, a copy of this application is being provided to the State of South Carolina.

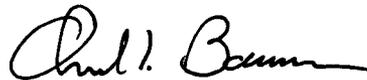
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If you have any questions concerning this matter, please contact Mr. Curt Castell at (843) 857-1626.

Sincerely,



C. T. Baucom

Manager – Support Services – Nuclear

CTB/cac

Attachments: I. Affirmation
II. Response to NRC Request for Additional Information Related to Proposed Technical Specifications Changes to Section 3.3.1, Reactor Protection System Instrumentation

c: S. E. Jenkins, Manager, Infectious and Radioactive Waste Management Section (SC)
A. Gantt, Chief, Bureau of Radiological Health (SC)
L. A. Reyes, NRC, Region II
M. G. Vaaler, NRC, NRR
NRC Resident Inspector, HBRSEP
Attorney General (SC)

AFFIRMATION

The information contained in letter RNP-RA/08-0031 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, also known as Progress Energy Carolinas, Inc. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 6/23/08



T. D. Walt

Site Vice President, HBRSEP, Unit No. 2

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

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION RELATED TO PROPOSED TECHNICAL SPECIFICATIONS CHANGES TO SECTION 3.3.1, REACTOR PROTECTION SYSTEM INSTRUMENTATION

The following response is provided for the NRC request for additional information (RAI) that was provided in an electronic mail transmission dated January 15, 2008:

NRC Request:

By letter dated November 29, 2007, Carolina Power & Light (the licensee), now doing business as Progress Energy Carolinas, Inc., submitted a license amendment request (LAR) to change the setpoint of the reactor trip on turbine trip interlock for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR).

Page 8 of Attachment II to the LAR indicated that the licensee will implement modifications to the steam dump system identified in Westinghouse Report LTR-SCS-06-22, "H. B. Robinson Unit 2 Turbine Trip without Reactor Trip Transient from the P-8 Setpoint Analysis," which was included in the LAR as Attachment V.

The Westinghouse report indicated on page 10 that either "option 1" or "option 2" plant modifications could be used to satisfy the Three Mile Island (TMI) Action Item II.K.3.10 requirements concerning the probability of a small-break loss-of-coolant accident resulting from a stuck-open power-operated-relief-valve.

Please specify whether the identified "option 1" or "option 2" plant modifications will be selected to implement at HBR, and discuss the rationale for the selection. Also, discuss the plant modification plan and implementation program used to assure that HBR will include the required modifications when the plant is operated with the proposed interlock setpoint.

Response:

Option 2 from the Westinghouse report has been selected. The Westinghouse report shows that Option 2 results in fewer fluctuations in plant parameters during the transient response, when compared with Option 1. Additionally, plant response was evaluated by testing Option 2 on the plant-specific simulator for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which supported the conclusions in the Westinghouse report. Therefore, Option 2 is the preferred option.

The Westinghouse report shows that either Option 1 or 2 can be used. Additionally, the acceptance criteria for this analysis, as documented in the Westinghouse report, is demonstration that the pressurizer power-operated relief valves are not expected to open during the transient conditions created by a turbine trip at approximately 40% power without a direct input to reactor trip.

Changes to the condenser steam dump control system can be made under licensee control in accordance with 10 CFR 50.59, provided that this and other applicable acceptance criteria for condenser steam dump system operation are met. Therefore, the statement that Option 2 has been chosen is not considered a commitment to implement Option 2, as described in the Westinghouse report. The commitment for plant modification, as stated in the November 29, 2007, license amendment request letter states, "This license amendment request includes a commitment to complete a plant modification in accordance with the engineering change process, which will be implemented to conduct the required plant changes."

Plant modification is required for implementation of changes associated with the turbine trip reactor protection system interlock. The plant modification includes changes to the reactor protection system wiring that will change the turbine trip reactor protection function interlock from the P-7 permissive circuitry to the P-8 permissive circuitry. The plant modification also includes changes to the condenser steam dump control system consistent with those identified in the Westinghouse report.

The plant modification requirements are documented in Engineering Change (EC) 63785. The modification includes the installation requirements and procedure updates that will implement the required interlock and control system changes. The reactor protection system interlock changes involve moving and connecting wires within the reactor protection system. The condenser steam dump control system changes involve changes to calibration procedures that are required to be performed in accordance with the installation instructions for the modification.

Option 2 from the Westinghouse report provides the proposed condenser steam dump system control settings for the plant trip controller proportional gain, the plant trip controller trip-open setpoints for Bank 1 and Bank 2, and the sudden loss of load bistables. These settings will be established and controlled in accordance with the calibration procedure changes described in EC 63785. The procedure controls for these settings remain consistent with the current requirements for maintaining the condenser steam dump control system settings, including the calibration procedure being subject to the requirements of 10 CFR 50.59.

Procedure EGR-NGGC-0005, "Engineering Change," contains explicit instructions for modification turnover to operations. The turnover section of EC 63785 states that the required work tickets shall be in the "Finished" status and that the required documents are updated.

Therefore, the modification requirements for EC 63785 establish the necessary steps and conditions that ensure the required modifications will be completed prior to plant operation with the proposed interlock change for the turbine trip.