

#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

July 20, 2010

Mr. Eric McCartney, Vice President Carolina Power & Light Company
H. B. Robinson Steam Electric Plant, Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING CHANGES TO TECHNICAL SPECIFICATION SECTION 3.3.2, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION, AND SECTION 3.3.6, CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION (TAC NO. ME3507)

Dear Mr. McCartney:

By letter dated March 5, 2010, Carolina Power & Light Company, doing business as Progress Energy Carolinas, Inc., submitted to the Nuclear Regulatory Commission an application for a license amendment for the H.B. Robinson Steam Electric Plant, Unit No. 2. The proposed amendment consists of changes to Technical Specification (TS) Section 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," and TS Section 3.3.6, "Containment Ventilation Isolation Instrumentation."

The proposed amendment changes TS 3.3.2 to revise the requirements for an inoperable Containment Pressure – High High channel and changes TS 3.3.6 to correct an error related to table references. Specifically, the change would allow an inoperable Containment Pressure – High High channel to be taken out of the trip condition for up to 6 hours for maintenance.

In order for the staff to complete its review of the information provided, we request that the licensee provide responses to the enclosed request for additional information (RAI). Based on discussions with your staff, we understand that you plan to respond to the enclosed RAI by October 18, 2010.

E. McCartney

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If you have any questions about this material, please contact me at (301) 415-2788.

Sincerely,

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Tracy J. Orf, Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: RAI

cc: Distribution via Listserv

### **REQUEST FOR ADDITIONAL INFORMATION**

### LICENSE AMENDMENT REQUEST

### ENGINEERED SAFETY FEATURE ACTUATION SYSTEM AND

### CONTAINMENT VENTILATION ISOLATION SYSTEM

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

# PROGRESS ENERGY

# DOCKET NO. 50-261

By letter dated March 5, 2010, Carolina Power & Light Company (the licensee), also known as Progress Energy Carolinas, Inc., submitted to the U. S. Nuclear Regulatory Commission an application for a license amendment related engineered safety feature actuation system and containment ventilation isolation system.

To continue its review of the submittal, the staff requests the following additional information:

- 1. This technical specifications change will effectively increase the allowable channel bypassed time from 6 hours to 12 hours, which increases the probability of a safety function failure. Has this change been factored into the plant's probable risk assessment? If so, then what was the overall impact?
- 2. In the justification for the proposed change provided, the licensee stated that the added 6-hour allowance is acceptable based on the low probability of an accident or transient occurring during that time period. It also states that there is a high probability that the channels will still perform their actuation function. The staff requests that the licensee provide quantifiable bases for these statements.
- 3. The licensee stated that in most cases, 6 hours should provide sufficient time to perform maintenance activities required to return a channel to service. If this is the case, then why is the current 6-hour completion time not sufficient to support the necessary maintenance activities? The affected channel would not be required to be tripped during this initial time period and module replacements could be performed without necessitating the use of the extraordinary measures described in the application.

E. McCartney

- 2 -

If you have any questions about this material, please contact me at (301) 415-2788.

Sincerely,

# /RA/

Tracy J. Orf, Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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