

Serial: RNP-RA/12-0085

AUG 16 2012

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

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

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
RELATED TO TECHNICAL SPECIFICATION CHANGE REGARDING
CORRECTIONS TO TABLE 3.3.1-1 NOTE 1

Ladies and Gentlemen:

By letter to the Nuclear Regulatory Commission (NRC) dated March 16, 2012 (Agencywide Documents Access and Management System Accession No. ML 12083A292), Carolina Power & Light Company, now doing business as Progress Energy, Inc., submitted a license amendment request to the Technical Specifications (TSs) of the H. B. Robinson Steam Electric Plant (HBRSEP) Unit No. 2. The proposed amendment would make corrections in TS Table 3.3.1-1 Note 1 for Overtemperature Delta Temperature (OTΔT) consistent with NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 3.

By NRC letter dated July 5, 2012, the NRC staff requested additional information needed to complete the review of the license amendment request. The additional information was requested by August 20, 2012, and is provided in the Attachment to this letter.

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

This document contains no new Regulatory Commitments. If you have any questions concerning this matter, please contact Mr. Richard Hightower, Supervisor – Licensing/Regulatory Programs at (843) 857-1329.

Sincerely,



Sharon A. Wheeler
Manager

Organization Effectiveness - RNP

United States Nuclear Regulatory Commission

Serial: RNP-RA/12-0085

Page 2 of 2

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Attachment: Response to the NRC Request for Additional Information Related to Technical Specification Change Regarding Corrections to Table 3.3.1-1 Note 1

c: Ms. S. E. Jenkins, Manager, Infectious and Radioactive Waste Management Section (SC)
Mr. V. M. McCree, NRC Region II
Ms. A. T. Billoch-Colón, NRC Project Manager, NRR
NRC Resident Inspector, HBRSEP Unit No. 2
Mr. A. Wilson, Attorney General (SC)

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CORRECTIONS TO TABLE 3.3.1-1 NOTE 1

NRC Question

1. Page 3 of the Enclosure to letter dated March 16, 2012, states that:

TSTF [Technical Specification Task Force]-310 [Changes to Table 3.3.1-1] also identified that the direction of conservatism for K3 constant was not identified and recommended replacing the equality (=) with an inequality (\geq). However, for both K2 and K3 constants, the equality (=) currently provided and the lack of the direction of conservatism, supports the current HBRSEP Unit No. 2 licensing basis and no change is required.

Explain why the use of equality (=) and the lack of the direction of conservatism in both K2 and K3 constants remain adequate and acceptable for HBRSEP, considering the approach used in TSTF-310 and NUREG-1431 (Revision 4).

Progress Energy Response

Technical Specifications Task Force Traveler TSTF-310 was rejected by NRC letter dated January 10, 2002 (Agencywide Document Accession Management System No. ML020110009) based on the following:

The STS Table 3.3.1.1-1, Note 1 for Overtemperature delta Temperature (OTdT) equation, variables and variables values serve as a generic model for trip setpoint calculation. In practice, providing the correct equation for operating plants involves making changes to the NUREG-1431 equation to be consistent with the plant-specific safety analysis setpoint methodology. Therefore, the staff position is that proposed changes to the STS OTdT equation represented in Note 1 to Table 3.3.1-1 can be reviewed on a case-by-case basis for specific plant amendment requests. (*sic*)

Consistent with the NRC staff's recognition that the correct equation for operating plants involve making changes to the NUREG-1431 equation, changes to the equation were made upon conversion of the HBRSEP Unit No. 2 TSs to the Standard Technical Specifications (STS) format (NUREG-1431, Revision 1). Specifically, justification for differences in Table 3.3.1-1 Note 1 between NUREG-1431, Revision 1, and the converted HBRSEP Unit No. 2 TS include Justification Note 15:

Justification Note 15:

ITS Table 3.3.1-1, Note 1 and Note 2, Overtemperature ΔT and Overpower ΔT , are modified to reflect the plant specific algorithm for determining the Overtemperature ΔT and Overpower ΔT setpoints from plant input parameters.

In NUREG-1431, Revision 1, the value of parameter K2 is variable (\geq) while the value of parameter K3 is constant (=). In NUREG-1431, Revisions 2, 3, and 4, the values of both parameters (K2 and K3) are variable (\geq).

The same constant values for parameters K2 and K3 have been specified in Table 3.3.1-1 Note 1 since the conversion of the HBRSEP Unit No. 2 custom TS to the STS format (NUREG-1431, Revision 1).

Therefore, consistent with the NRC's staff basis for rejection of the changes of TSTF-310 for generic application and recognition that changes are appropriate on a case-by case plant specific basis, the continued specification of the values of the parameters K2 and K3 in the OT ΔT reactor trip setpoint equation as constants [use of equality (=) operator] is appropriate and consistent with the approach used in the safety analysis setpoint methodology applied to HBRSEP Unit No. 2.