# STATE OF THE COMMISSION OF THE

# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 8, 2012

Mr. William R. Gideon, Vice President Carolina Power & Light Company H.B. Robinson Steam Electric Plant, Unit 2 3581 West Entrance Road Hartsville, South Carolina 29550

SUBJECT:

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – REQUEST FOR ADDITIONAL INFORMATION FOR REVIEW REGARDING DELETION OF THE

REACTOR TRIP ON STEAM GENERATOR WATER LEVEL LOW

CONCURRENT WITH STEAM FLOW/FEEDWATER FLOW MISMATCH FROM

THE TECHNICAL SPECIFICATIONS (TAC NO. ME9516)

Dear Mr. Gideon:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated September 6, 2012 (Agencywide Documents Access and Management System Accession No. ML12263A424), Carolina Power & Light Company (the licensee), doing business as Progress Energy Carolinas, submitted a license amendment request (LAR) for H.B. Robinson Steam Electric Plant, Unit 2. The LAR requests approval to delete Function 14, Steam Generator Water Level – Low Coincident with Steam Flow/Feedwater Flow Mismatch, from Technical Specifications Table 3.3.1-1, Reactor Protection System Instrumentation.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on November 6, 2012, it was agreed that you would provide a response 30 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources.

Please contact me at (301) 415-3302 if you have any questions.

Sincerely,

aracdi T. Billoh loli

Araceli Billoch Colón, Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: Request for Additional Information

cc w/encl: Distribution via ListServ

#### REQUEST FOR ADDITIONAL INFORMATION

#### REGARDING H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

## LICENSE AMENDMENT REQUEST REGARDING DELETION

#### OF THE REACTOR TRIP ON STEAM GENERATOR WATER LEVEL LOW

#### CONCURRENT WITH STEAM FLOW /FEEDWATER FLOW MISMATCH FROM THE

# **TECHNICAL SPECIFICATIONS**

#### **DOCKET NO. 50-261**

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated September 6, 2012 (Agencywide Documents Access and Management System Accession No. ML12263A424), Carolina Power & Light Company (the licensee), doing business as Progress Energy Carolinas, submitted a license amendment request (LAR) for H.B. Robinson Steam Electric Plant, Unit 2 (HBRSEP). The LAR requests approval to delete Function 14, Steam Generator (SG) Water Level – Low Coincident with Steam Flow/Feedwater Flow Mismatch, from Technical Specifications (TS) Table 3.3.1-1, Reactor Protection System Instrumentation. The NRC staff has been reviewing the submittal and has determined that additional information is needed to complete its review.

- Reference 1 of Section 6.0 of the LAR refers to the Westinghouse Nuclear Safety Advisory Letter NSAL-96-004 "Control and Protection System Interactions," dated August 14, 1996 (ADAMS Accession No. ML052570651). ADAMS search indicates ML052570651 is for a non-proprietary version of Enclosure 1A of Supplemental Licensing Input L-2005-171, dated July 2005.
  - Provide the correct reference for the proprietary version of the document that the staff should use for the LAR review.
- 2. It is stated in the last paragraph of page 3 of the enclosure to the LAR, that each reactor protective system (RPS) level signal is provided to the median selector via an isolation device to separate the qualified and nonqualified portions of the system.

Provide schematic diagrams and relevant documents and/or explanations on the RPS and control loops involved, indicating where the isolation devices are located, how the isolation devices are qualified and how the RPS and the control loops will comply to the requirements of the Institute of Electrical and Electronics Engineers (IEEE) Standard 279-1971, especially Clause 4.7.2.

In addition, confirm that the proposed modification does not negatively impact the licensee's compliance with IEEE Standard 279-1971, Clause 4.9, with respect to checking the SG levels sensors.

- 3. Provide information on what is contemplated to be done with the devices currently used in the SG Water Level Low, Coincident with Steam Flow/Feedwater Flow Mismatch trip function in TS Table 3.3.1-1 after the proposed elimination of this function from reactor trip, especially considering that this instrument loop can be used to provide useful information and alert on the SG water Level and Steam Flow/Feedwater Flow mismatch.
- 4. Page 5 of the enclosure to the LAR, indicates that the proposed reactor trip to be deleted from the TS was not credited in the HBRSEP safety analyses presented in Chapter 15 of the Updated Final Safety Analysis Report (UFSAR).

Provide a table listing the reactor trip(s) credited in the analyses for each of the events presented in the HBRSEP UFSAR Chapter 15, and show that the reactor trip on SG water level low concurrent with steam flow/feedwater flow mismatch is not one of the reactor trips credited in the Chapter 15 analyses.

### November 8, 2012

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 - REQUEST FOR

ADDITIONAL INFORMATION FOR REVIEW REGARDING DELETION OF THE

REACTOR TRIP ON STEAM GENERATOR WATER LEVEL LOW

CONCURRENT WITH STEAM FLOW /FEEDWATER FLOW MISMATCH FROM

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Sincerely. /RA/

Araceli Billoch Colón, Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

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