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RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amend to License DPR-23, adding ANF-88-133(P)(A), "Qualification of Advanced Nuclear Fuels PWR Design Methodology for Rod Burnups of 62 Gwd/MTU," to approved methodologies in TS Section 6.9.2.2.b.

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Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

MAR 03 1993

SERIAL: NLS-93-063
10 CFR 50.90

R. B. STARKEY, JR.
Vice President
Nuclear Services Department

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

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

REQUEST FOR LICENSE AMENDMENT - CORE OPERATING LIMITS REPORT METHODOLOGY AND
MINOR ADMINISTRATIVE CHANGES

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). The proposed change will: (1) add ANF-88-133(P)(A), "Qualification of Advanced Nuclear Fuels' PWR Design Methodology for Rod Burnups of 62 Gwd/MTU," to the approved methodologies list of Section 6.9.3.3.b, (2) clarify wording in Sections 3.10.2.1 and 3.10.2.2.2 by describing more precisely how measurement uncertainty and engineering factors are considered as committed in our April 16, 1992 letter, (3) correct an inadvertent typographical error made in Amendment 141 in Section 3.10.2.2, and (4) correct a reference to Section 6.9.3.3.b on page 3.10-16a of the Technical Specification basis.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details, in accordance with 10 CFR 50.91(a), the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the proposed Technical Specification pages.

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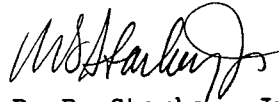
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In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the proposed license amendment.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

Please refer any questions regarding this submittal to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,



R. B. Starkey, Jr.


JSK/jbw

Enclosures:

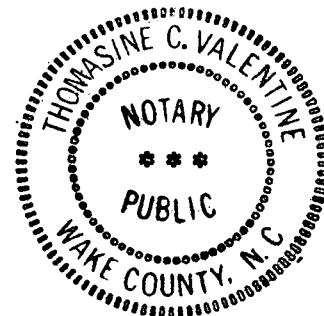
1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Technical Specification Pages

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
Ms. B. L. Mozafari
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

R. B. Starkey, Jr., having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 1-31-95



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

BASIS FOR CHANGE REQUEST

Background

Pursuant to Amendment No. 141, Section 6.9.3.3.b. of the H. B. Robinson Unit No. 2 Technical Specifications was established as the list of NRC approved methodologies used as the design bases support for the numerical values of the various core operating limits and/or restrictions specified in the HBR2 Core Operating Limits Report (COLR). Periodically new methodologies are reviewed and approved by the NRC and are applicable to HBR2 in support of the COLR numerical values. In order to apply the approved methodology to HBR2, an administrative Technical Specification (TS) change to update to the approved methodology list of TS 6.9.3.3.b is necessary. The proposed addition of ANF-88-133(P)(A) to this list of approved methodologies is an example of such a change.

Also, on a periodic basis, typographical errors or unclear wording in the Technical Specifications are identified which need correction or clarification. The proposed changes to the Technical Specification basis on page 3.10-16a and to Specifications 3.10.2.1, 3.10.2.2 and 3.10.2.2.2 are such cases.

Proposed Change

The proposed change will: (1) add ANF-88-133(P)(A), "Qualification of Advanced Nuclear Fuels' PWR Design Methodology for Rod Burnups of 62 Gwd/MTU," to the approved methodologies list of Section 6.9.3.3.b, (2) clarify wording in Sections 3.10.2.1 and 3.10.2.2.2 by describing more precisely how measurement uncertainty and engineering factors are considered, (3) correct an inadvertent typographical error made in Amendment 141 in Section 3.10.2.2, and (4) correct a reference to Section 6.9.3.3.b on page 3.10-16a of the Technical Specification basis.

Basis

In 51 FR 7750, the NRC provided guidance for classifying requested changes to the Technical Specifications as administrative in nature. The Technical Specification amendments proposed herein are similar to those described in the guidance. Neither the proposed basis change, the corrections to typographical errors, nor the wording clarification change alter the meaning or content of any portion of the Technical Specifications. The proposed update to the methodology list adds a reference previously reviewed and approved by the NRC.

No safety related equipment, safety functions, or plant operations will be altered as a result of these administrative changes. Neither will there be any changes to the plant design basis or operational procedures.

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10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards determination. The bases for this determination are as follows:

Proposed Change

The proposed change will: (1) add ANF-88-133(P)(A), "Qualification of Advanced Nuclear Fuels' PWR Design Methodology for Rod Burnups of 62 Gwd/MTU," to the approved methodologies list of Section 6.9.3.3.b, (2) clarify wording in Sections 3.10.2.1 and 3.10.2.2.2 by describing more precisely how measurement uncertainty and engineering factors are considered, (3) correct an inadvertent typographical error made in Amendment 141 in Section 3.10.2.2, and (4) correct a reference to Section 6.9.3.3.b on page 3.10-16a of the Technical Specification basis.

Basis

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The addition of an NRC previously reviewed and approved methodology to the list of Technical Specification 6.9.3.3.b, the wording clarification of Technical Specification 3.10.2.1 and 3.10.2.2.2, the typographical error correction in Technical Specification 3.10.2.2, and the correction to the basis reference will have no influence on the probability of an accident previously evaluated. No changes will be made to any safety related equipment, systems, or setpoints used in determining the probability of an evaluated accident. No changes in plant operation are required. The plant design basis will not be altered. Therefore, there will be no significant increase in the probability of an accident previously evaluated.

Consequences are dependent on the type of accident and the mitigating response of safety related equipment. Furthermore, the magnitude of consequences are calculated (directly or through supporting calculations) by use of NRC approved methodologies. The proposed license amendment will not alter the function of safety related equipment designed to mitigate the consequences of an accident previously evaluated or allow operation of the facility outside any current limitations or restrictions. Also, this amendment will not alter the requirement that evaluation of the consequences of a accident previously evaluated be determined with NRC reviewed and approved methodologies. Accordingly the proposed license amendment will not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes will not result in any design or function changes to any safety related equipment designed to prevent and/or mitigate accidents, to any setpoints or systems, or to any portion of the plant design basis. Operation of the facility will remain within all required limitations and restrictions. Therefore, the proposed amendment will not create the possibility of a new kind of accident from any accident previously evaluated.

The proposed changes will not result in any design or function changes to any safety related equipment designed to prevent and or mitigate accidents, to any setpoints or systems, or to any portion of the plant design basis. Operation of the facility will remain within all required limitations and restrictions. Therefore, the proposed amendment will not create the possibility of a different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The proposed license amendment is administrative in nature. No current operational limits, restrictions, or operating modes of the facility and its equipment (safety related or otherwise) designed to preserve the margin of safety will be changed or affected by the proposed amendment. There will be no changes to setpoints or to the plant design basis. The methodology proposed for addition to Technical Specification 6.9.3.3.b has been previously reviewed and approved by the NRC. Accordingly the proposed license amendment will not involve a significant reduction in the margin of safety.

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

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluent that may be released off-site; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment 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

The proposed change will: (1) add ANF-88-133(P)(A), "Qualification of Advanced Nuclear Fuels' PWR Design Methodology for Rod Burnups of 62 Gwd/MTU," to the approved methodologies list of Section 6.9.3.3.b, (2) clarify wording in Sections 3.10.2.1 and 3.10.2.2.2 by describing more precisely how measurement uncertainty and engineering factors are considered, (3) correct an inadvertent typographical error made in Amendment 141 in Section 3.10.2.2, and (4) correct a reference to Section 6.9.3.3.b on page 3.10-16a of the Technical Specification basis.

Basis

The 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 Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluent that may be released off-site. The proposed changes are entirely administrative and do not involve any changes in plant equipment or operation. As such, the change can not affect the types or amounts of any effluent that may be released off-site.
3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed changes are entirely administrative and do not involve any changes in plant equipment or operation. As such, the change has no affect on either individual or cumulative occupational radiation exposure.