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RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Application for amend to License DPR-23, revising TS 6.13.1  
to provide use of alarming dosimeters in high radiation  
areas. Change includes newly revised 10CFR20 requirement refs  
& consistent w/NUREG-1431.

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Carolina Power & Light Company  
Robinson Nuclear Plant  
PO Box 790  
Hartsville SC 29550

November 4, 1993

Robinson File No: 13510HA

Serial: RNP/93-2683  
10 CFR 50.90

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  
PERMIT USE OF ALARMING DOSIMETERS

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).

This proposed amendment revises Technical Specification (TS) 6.13.1 to provide use of alarming dosimeters in High Radiation Areas. This change includes newly revised 10 CFR 20 requirement references and is consistent with NUREG 1431, Standard Technical Specifications for Westinghouse Plants (MERITS).

MERITS provides for use of a radiation monitoring device that continuously integrates the radiation dose rate. Alarming dosimeters are used as radiation monitoring devices in a high radiation area after the dose rates of the area have been established. The proposed amendment is consistent with NUREG 1431, Standard Technical Specifications - Westinghouse Plants, Specification 5.11.1.

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.

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Highway 151 and SC 23 Hartsville SC

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November 4, 1993

Enclosure 5 provides the proposed Technical Specification page.

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. Jan S. Kozyra at (803) 383-1872.

Very truly yours,



Charles R. Dietz  
Vice President

DTG:lst

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

c: Mr. S. D. Ebnetter  
Ms. B. L. Mozafari  
Mr. W. T. Orders  
Mr. Heyward G. Shealy (SC)  
Attorney General (SC)

C. R. Dietz, 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.

Deborah W. Martin  
Notary (Seal)

My commission expires:

6/23/98

ENCLOSURE 1

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

Technical Specification 6.13.1 presently requires use of a radiation monitoring device which continuously indicates the radiation exposure rate. This device, as written, does not allow for advancement in electronic technology such as a device that continuously integrates the radiation dose rate (alarming dosimeter).

Proposed Change

The proposed change will allow use of alarming dosimeters only after the dose rate levels in the area have been established and personnel have been made knowledgeable of them. Technical Specification 6.13, High Radiation Area, has been reformatted to be consistent with Standard TS, and 10 CFR 20 references have been corrected to conform with the currently revised 10 CFR 20. This change also includes an exemption that will allow Health Physics Technicians or personnel continuously escorted by such individuals not be required issuance of a Radiation Work Permit (RWP).

Basis

This proposed amendment is consistent with Standard TS (NUREG 1431) and is consistent with CP&L's Harris and Brunswick Plants TS. Newly revised 10 CFR 20 requirements have been incorporated. Utilization of alarming dosimeters with both audible and visible alarms will provide greater assurance that dose limits will not be exceeded.

Conclusions

This request involves the use of alarming dosimeters as radiation monitoring devices in High Radiation Areas. The alarming dosimeters would be used after the exposure rates are established using normal survey techniques and survey meters. This enhancement was coordinated with the revision to 10 CFR 20 and NUREG 1431, Standard Technical Specifications - Westinghouse Plants. Using alarming dosimeters should enhance personnel radiation safety by warning personnel when their allowable exposure has been received. Alarming dosimeters also have visible readouts that could provide additional protection via their readily visible display of the worker's dose, especially when working in high noise areas. Adoption of the proposed amendment would be an enhancement to the ALARA Program.

## ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENDMENT10 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 allow use of alarming dosimeters only after the dose rate levels in the area have been established and personnel have been made knowledgeable of them. Technical Specification 6.13, High Radiation Area, has been reformatted to be consistent with Standard TS and 10 CFR 20 references have been corrected to conform with the currently revised 10 CFR 20. This change also includes an exemption that will allow Health Physics Technicians or personnel continuously escorted by such individuals not be required issuance of a Radiation Work Permit (RWP).

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. This change could involve a reduction in personnel radiation exposure by utilizing alarming dosimeters. This change does not involve any plant systems or components which could increase the probability of an accident. Therefore, there would be no increase in the probability or 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. This change could reduce the possibility of an accidental overexposure by alerting personnel when their maximum allowable exposure has been received. This change does not involve any plant systems or components. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety. Due to the nature of this proposed change, it is not related to any plant system. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

ENCLOSURE 3

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

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 offsite, or (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 allow use of alarming dosimeters only after the dose rate levels in the area have been established and personnel have been made knowledgeable of them. Technical Specification (TS) 6.13, High Radiation Area, has been reformatted to be consistent with Standard TS and 10 CFR 20 references have been corrected to conform with the currently revised 10 CFR 20. This change also includes an exemption that will allow Health Physics Technicians or personnel continuously escorted by such individuals not be required issuance of a Radiation Work Permit (RWP).

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 offsite.

The proposed amendment is administrative and does not impact any plant systems; therefore, it can not result in any offsite releases. As such, the change cannot affect the types or amounts of any effluent that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure.

It should aid in decreasing individual radiation exposure through the use of advanced electronic technology features: audible dose limit alarm function and visible readout of cumulative dose received. The changes proposed are to increase personnel awareness of personal radiation exposure. Therefore, the amendment has no adverse affect on either individual or cumulative occupational radiation exposure.