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AUTH.NAME AUTHOR AFFILIATION
KRICH,R.M. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to license DPR-23,revising introduction to TS Section 6.9.3.3.b to require approved rev number for ref analytical methods be listed in COLR & updating methodology ref in TS Section 6.9.3.3.b.f.

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P R I O R I T Y 1 D O C U M E N T

CP&L

10 CFR 50.90

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

RNP File No: 13510HA
Serial: RNP/94-1719

OCT 7 1994

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT No. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
CORE OPERATING LIMITS REPORT METHODOLOGY AND REFERENCE CHANGE

Gentlemen:

In accordance with 10 CFR 50.90, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

The proposed change will update one reference and add two new references to the NRC approved TS methodology list, and revises the TS Section 6.9.3.3.bintroductory wording to meet a prior NRC commitment.

Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b).

Enclosure 2 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 3 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 4 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 5 provides page change instructions for incorporating the proposed revisions.

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Enclosure 6 provides the proposed Technical Specification pages.

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. K. R. Jury at (803) 383-1363.

Yours very truly,

R. M. Krich
Manager - Regulatory Affairs

Enclosures:

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

c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. S. D. Ebneter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
Attorney General (SC)

ENCLOSURE 1
Affidavit

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter RNP/94-1719 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.

C S Hinnant

Gail B. Kiven
Notary (Seal)

My commission expires: August 19, 2004

ENCLOSURE 2

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

Proposed Change

The introduction to Technical Specification (TS) Section 6.9.3.3.b will be revised to require the approved revision number for the referenced analytical methods be listed in the COLR as committed to in a prior NRC commitment.

The methodology referenced in TS Section 6.9.3.3.b.f (XN-NF-82-49(A)) will be updated to clarify that all supplements are included.

New methodologies ANF-89-151(A) and EMF-92-081(A) will be added to TS Section 6.9.3.3.b.

Basis

In 51 FR 7750, the NRC provided guidance for identifying requested changes to the TS as administrative in nature. The TS amendments proposed herein are similar to those described in the guidance. The proposed methodology list amendments add/update references previously reviewed and approved by the NRC. The proposed changes to the introductory wording satisfy a prior NRC commitment that is administrative in nature.

A list of NRC approved methodologies was established in Amendment No. 141 to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 TS Section 6.9.3.3.b, to be used as the design bases support for the numerical values of the various core operating limits and/or restrictions specified in the HBRSEP Core Operating Limits Report (COLR). Periodically new methodologies are reviewed and approved by the NRC and applied to HBRSEP in support of the COLR numerical values, or, methodologies previously reviewed and approved by the NRC are updated and newly applied in support of the COLR numerical values. In either case, updates to the approved methodology list are necessary. The proposed update to XN-NF-82-49(A), and addition of ANF-89-151(A) "ANF-RELAP Methodology for Pressurized Water Reactors: Analysis of Non-LOCA Chapter 15 Events," approved March 16, 1992, and EMF-92-081(A) "Statistical Setpoint/Transient Methodology for Westinghouse Type Reactors," approved December 10, 1993, to this list of approved methodologies are examples of both. The new and updated methodologies were provided to the NRC by letter dated July 15, 1994.

The change to the introductory wording of TS Section 6.9.3.3.b will formally implement a prior commitment to the NRC documented in our letter dated August 12, 1994. The commitment is administrative in nature requiring the specific approved revision number for each of the TS Section 6.9.3.3.b general methodology references be listed in the COLR.

Accordingly the proposed changes have no impact upon plant operation or safety. No safety related equipment, safety functions, or plant operations will be altered as a result of these administrative changes. There will be no changes to the plant design basis.

Conclusions

The proposed changes are administrative in nature and are acceptable for implementation at HBRSEP.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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10 CFR 50.92 EVALUATION

The NRC 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 concluded that its adoption would not involve a significant hazards consideration. The bases for this conclusion are as follows:

Proposed Change

The introduction to Section 6.9.3.3.b will be revised to require the approved revision number for the referenced analytical methods be listed in the COLR as committed to in a prior NRC commitment.

The methodology referenced in 6.9.3.3.b.f (XN-NF-82-49(A)) will be updated to clarify that all supplements are included.

New methodologies ANF-89-151(A) and EMF-92-081(A) will be added to TS Section 6.9.3.3.b.

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 proposed changes 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. 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 an accident previously evaluated be determined/supported with NRC reviewed and approved methodologies. The change to TS Section 6.9.3.3.b's introductory wording satisfies an administrative commitment and the requirements it adds are administrative in nature. Accordingly the proposed license amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

ENCLOSURE 3

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The addition of and update to NRC previously reviewed and approved methodologies in TS Section 6.9.3.3.b 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/or restrictions. The change to TS Section 6.9.3.3.b's introductory wording satisfies an administrative commitment and the requirements it adds are administrative in nature. Therefore, the proposed amendment will not create the possibility of a new kind of accident from any accident previously evaluated.

   The addition of and update to NRC previously reviewed and approved methodologies in TS Section 6.9.3.3.b 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/or restrictions. The change to TS Section 6.9.3.3.b's introductory wording satisfies an administrative commitment and the requirements it adds are administrative in nature. 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 defined as 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 TS Section 6.9.3.3.b and the methodology that will be updated has been previously reviewed and approved by the NRC. The change to TS Section 6.9.3.3.b's introductory wording satisfies an administrative commitment and the requirements it adds are administrative in nature. Accordingly the proposed license amendment will not involve a significant reduction in the margin of safety.

CONCLUSION

The NRC has provided guidance in 51 FR 7750 in the application of standards for determining whether a significant hazards consideration exist as the result of a license amendment. This guidance includes examples of amendments not likely to involve significant hazards considerations. The changes to the HBRSEP TS requested by this proposed license amendment are similar to those of administrative changes identified in the guidance.

In light of this argument, and per the significant hazards evaluation provided above, Carolina Power and Light Co. has concluded that the proposed license amendment does not involve any significant hazards considerations.

ENCLOSURE 4

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

10 CFR 51.22(c)(9) provides criteria for 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 effluents that may be released offsite; (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 introduction to TS Section 6.9.3.3.b will be revised to require the approved revision number for the referenced analytical methods be listed in the COLR as committed to in a prior NRC commitment.

The methodology referenced in TS Section 6.9.3.3.b.f (XN-NF-82-49(A)) will be updated to clarify that all supplements are included.

New methodologies ANF-89-151(A) and EMF-92-081(A) will be added to TS Section 6.9.3.3.b.

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 3, 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 effluents that may be released offsite. The proposed change is administrative in nature. There will be no change to equipment or modes of operation or testing of equipment. No physical plant changes will result from this amendment. As such, the change can not affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is administrative in nature. No changes to equipment or modes of operation or testing of equipment will result from this proposed change. The proposed change to incorporate the updated methodology list which was previously approved by the NRC and incorporates introductory wording to satisfy a prior NRC commitment that is administrative in nature.
Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 5
H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
6.9-13	6.9.13
6.9.14	6.9.14
6.9.18	6.9.18