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 AUTH. NAME      AUTHOR AFFILIATION  
 KRICH, R.M.      Carolina Power & Light Co.  
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SUBJECT: Transmits change to basis of TS Section 4.8 re surveillance testing of steam driven AF pump after periods of reactor being cold shutdown.

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**Carolina Power & Light Company**

Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

Robinson File No.: 13510I  
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**JUN 01 1995**

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
TECHNICAL SPECIFICATIONS BASIS CHANGE REGARDING TESTING OF STEAM  
DRIVEN AUXILIARY FEEDWATER PUMP

Gentlemen:

This letter transmits a change to the Basis of Technical Specifications (TS) Section 4.8 regarding surveillance testing of the steam driven auxiliary feedwater pump after periods of the reactor being in cold shutdown. The TS Basis Change was reviewed by the H. B. Robinson Steam Electric Plant, Unit No. 2 Plant Nuclear Safety Committee on May 24, 1995. The purpose of this TS Basis change is to provide additional information in the Bases to TS Section 4.8 which states, "When periods of reactor cold shutdown extend this interval beyond one month, the test shall be performed immediately following reactor heatup." The TS Basis change provides a clarification for "...immediately following reactor heatup..." in that the required surveillance testing of the steam driven auxiliary feedwater pump must be performed prior to reactor criticality, but not to exceed 24 hours after the reactor coolant system temperature has reached a minimum of 547 degrees Fahrenheit (i.e., the reactor coolant system temperature in which sufficient steam to drive the steam driven auxiliary feedwater pump is generated in the steam generators).

The clarification ensures that the surveillance testing of the of the steam driven auxiliary feedwater pump after periods of the reactor being in cold shutdown is performed after stable conditions that allow the testing to be performed are achieved.

Note that TS surveillance requirement 4.8 is duplicated by the TS section 4.0.1 requirement that the steam driven auxiliary feedwater pump be tested to the standards of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. ASME Code, Section XI, Article IWP-3000 provides for testing of the pump within 96 hours after the

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pump has been returned to normal service. Therefore, the clarification that the pump must be tested within 24 hours of achieving stable plant conditions is conservative relative to the requirements of the ASME Code.

Questions regarding this matter may be referred to Mr. A. L. Garrou at (803) 857-1544.

Very truly yours,



R. M. Krich  
Manager - Regulatory Affairs

Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II  
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP  
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP