

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

SUPPLEMENT 9

Remove and insert the following page into Enclosure 14 to Serial: RNP-RA/96-0141,
"Conversion Package Section 3.6," Part 3, "No Significant Hazards Consideration and
Basis for Categorical Exclusion from 10 CFR 51.22."

Remove Page

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Insert Page

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MORE RESTRICTIVE CHANGE
"M22" Change

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications are proposed to be modified to impose a new requirement for the minimum allowable internal atmospheric pressure in the containment which is more restrictive than that which currently exists. The proposed change is being requested to assure consistency with analysis performed in accordance with methods currently acceptable to the NRC. The requirement is an assumption in the inadvertent actuation of the Containment Spray System event analysis.

Carolina Power & Light Company has evaluated the proposed Technical Specification change and has concluded that the change does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change provides a requirement of -0.8 psig for the minimum allowable internal containment atmospheric pressure. This requirement is determined to be more restrictive than the current Technical Specifications requirement of -1.0 psig with respect to plant operation. The minimum allowable containment internal atmospheric pressure is not assumed to be an initiator of an analyzed event and the new requirement is consistent with a current analysis relative to mitigation of the inadvertent actuation of a containment spray event. This change has no effect on any other accident or transient previously evaluated. The new requirement being proposed is an assumption in an analysis which enhances assurance that process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis of the unit. Therefore, this change does not involve any increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve any physical alteration of plant systems, structures, or components or changes in parameters governing normal plant operation other than the minimum allowable containment atmospheric pressure. This change is consistent with assumptions made in the inadvertent containment spray event and has no other effect on other safety analyses or the licensing basis. The new requirement is a more restrictive Limiting Condition for Operations resulting from an analysis that enhances safe operation. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS SECTION 3.6 - CONTAINMENT SYSTEMS

3. Does this change involve a significant reduction in a margin of safety?

The imposition of the new requirement for the minimum allowable containment atmospheric pressure maintains the margin of plant safety by restricting operations to be consistent with an analysis of an inadvertent actuation of the containment spray system that utilizes analytical methods currently acceptable to the NRC. Therefore, this change does not involve a reduction in a margin of safety.