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*See
Proposed
Change To
Tech Specs*

SUBJECT: Forwards suppl 10 to CPL, Unit 2 Improved TS conversion
 submittal. Purpose of suppl, discussed.

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Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
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RNP File No: 13510HA
Serial: RNP-RA/97-0223

OCT 13 1997

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

**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
TRANSMITTAL OF SUPPLEMENT 10
REGARDING THE TECHNICAL SPECIFICATION
CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS**

Gentlemen:

This letter provides Supplement 10 to the Carolina Power & Light (CP&L) Company's H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Improved Technical Specifications (ITS) conversion submittal. This supplement consists of a table summarizing administrative changes to the Technical Specifications, proposes conditions to the Final Operating License DPR-23 regarding the implementation of new Surveillance Requirement Frequencies and relocation of requirements, and provides a minor correction and surveillance requirement change to the submittal as Supplement 10.

Tables summarizing less and more restrictive changes to the current Technical Specifications (CTS), and specifications and requirements that are relocated to licensee controlled documents were provided to the NRC by letter dated September 10, 1997. The following clarifications are added. For specifications and requirements that are relocated to the Offsite Dose Calculation Manual (ODCM), changes to the ODCM are controlled in accordance with the ODCM and 10 CFR 50.59. ITS Section 4.0 contains a less restrictive change to the CTS that permits limited substitutions of zirconium alloy or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations. ITS Section 4.0 also permits a limited number of lead test assemblies that have not completed representative testing to be placed in nonlimiting core regions. The change control process for using these provisions in ITS Section 4.0 will be in accordance with 10 CFR 50.59. The relocation destination for the monthly test requirement for the Auxiliary Feedwater Pumps has been changed from the

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Inservice Testing Program to the Technical Requirements Manual (TRM). The relocation destination for the Reactor Coolant Pump Flywheel inspection requirements has been changed from the Inservice Inspection Program to the TRM.

As a result of the development of the table summarizing administrative changes, errors were found in the Discussion of Changes (DOCs) for ITS Section 3.3. DOC 3.3 A6 was superseded in Supplement 4 by DOC 3.3 A31. However, DOC 3.3 A6 was not deleted in that supplement. Also DOC 3.3 A31 was not updated to reflect changes to footnote (e) to Table 3.3.1-1 in Supplement 8. Corrected pages to the DOCs for Section 3.3 are provided in Attachment III.

During a review of previous surveillance testing of the Emergency Diesel Generator (EDG) load sequencer, which was performed to assure that the new ITS acceptance criteria for ITS SR 3.8.1.14 would be met at implementation, CP&L found that the acceptance criteria as written could possibly have demonstrated a sequencer OPERABLE with test results inconsistent with design calculations for EDG load sequencing. Conversely, the acceptance criteria could possibly have demonstrated a sequencer inoperable with test results well within the required design parameters. The SR acceptance criteria as originally proposed is inappropriate to prove operability because the criteria is based upon the design interval between sequencer relay setpoints without consideration of the design setpoint of each relay. Hence the setpoint tolerance between the intervals could allow the interval to vary within the tolerance but outside to the total time requirement that an individual relay must operate to assure that EDG loads are sequenced as assumed in the accident analyses. Therefore, a change to SR 3.8.1.4 is proposed in Supplement 10.

By letter dated September 10, 1997, CP&L requested implementation of the ITS within 90 days of the issuance of the Safety Evaluation, and CP&L stated that implementation was expected to be completed during the week of October 20, 1997. The scheduled implementation of ITS during the week of October 20, 1997, assumed issuance of the final Safety Evaluation in early October 1997, and allowed for review and processing of the amendment, and completion of procedure changes required for implementation. Since the final Safety Evaluation cannot be issued before the week of October 20, 1997, due to the required comment period of 14 days for a Federal Register notice dated October 7, 1997, requesting public comment on one aspect of the proposed ITS (62FR194), implementation of ITS is now scheduled for the week of November 10, 1997, to allow for review and processing of the amendment.

Attachment I provides an affidavit as required by 10 CFR 50.30(b).

Attachment II contains the proposed additional license conditions.

Attachment III contains Supplement 10 with instructions for insertion of the pages into the submittal.

Attachment IV contains a table summarizing the administrative changes to the CTS.

Attachment V contains correction pages to matrices of changes provided previously to the NRC by letter dated September 10, 1997.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,



T. M. Wilkerson
Manager - Regulatory Affairs

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Attachments

- I. Affidavit
- II. Proposed Condition for Final Operating License DPR-23
- III. Supplement 10
- IV. Matrix of Administrative Changes
- V. Corrections to Previous Matrices of Changes

c: Mr. M. K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
Mr. B. B. Desai, USNRC Resident Inspector, HBRSEP
Attorney General (SC) (w/out Enclosures)
Lockheed Idaho Technology, Inc.

Affidavit

State of South Carolina
County of Darlington

J. S. Keenan, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/97-0223 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.

John S. Keenan

Sworn to and subscribed before me

this 13th day of October 1997

(Seal) Albert L. Garron
Notary Public for South Carolina

My commission expires: March 22nd, 2005