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ACCESSION NBR:8008040149 DOC.DATE: 80/08/01 NOTARIZED: YES DOCKET # FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261 AUTH.NAME AUTHOR AFFILIATION UTLEY,E.E. Carolina Power & Light Co,

RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: Application for amend to License DPR=23, changing Tech Specs to incorporate existing interim administration procedures re-RPI sys misalignment limits.Fee encl.

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August 1, 1980

File: NG-3514(R)

Serial No.: NO-80-1133

Office of Nuclear Reactor Regulation Attention: Mr. Steven A. Varga, Chief Operating Reactors Branch No. 1 United States Nuclear Regulatory Commission Washington, D. C. 20555

> H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2 DOCKET NO. 50-261 LICENSE NO. DPR-23 REQUEST FOR TECHNICAL SPECIFICATION CHANGE ROD POSITION INDICATION SYSTEM

Dear Mr. Varga:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) submits the attached changes to the H. B. Robinson Unit No. 2 Technical Specifications. The purpose of this amendment is to incorporate the existing interim administrative procedures concerning the rod position indication (RPI) system's misalignment limits into the Unit Technical Specifications.

In A. Schwencer's letter of October 29, 1979, the NRC requested that CP&L review the H. B. Robinson Unit Technical Specifications to ensure that the control rods are required to be maintained within +12 steps indicated and that the rod position indication system is verified to be accurate to within 12 steps. CP&L responded on December 14, 1979 that it intended to perform additional analysis to support the present technical specification requirement and proposed certain interim actions to be taken while the feasibility of a supporting analysis was being studied. Since the full power reactivity worths of the control rods at positions above 200 steps were sufficiently small such that a +24 step indicated misalignment from the rod bank would have no significant effect on the incore power distribution, the interim actions were only for control rods withdrawn to bank positions less than 200 steps. Plant administrative procedures were incorporated which allowed a +12 step (7.5 inches) RPI deviation from the average of the rod position indications for each bank without corrective action. If a deviation greater than 12 steps was detected, corrective action in accordance with the unit's Technical Specifications for a misaligned rod would be initiated.

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CP&L's feasibility study is now complete and it has shown that a supporting analysis would be neither practical nor cost effective. It is CP&L's intention to incorporate the interim procedures which have been in place since January 30, 1980 into the Technical Specification as a license amendment. As previously explained in CP&L's letter of December 14, 1979, CP&L believes these measures adequately meet the NRC's concerns while taking into account the limitations in the RPI system installed at H. B. Robinson Unit No. 2.

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In accordance with 10CFR170.12(c), we have determined that this revision constitutes a Class III amendment. Accordingly, our check for \$4000 is enclosed.

We trust this information satisfies your concerns and is suitable for your use. If you have any questions on this subject, please contact our staff.

Yours very truly,

mam. Dypi

E. E. Utley Executive Vice President Power Supply and Engineering & Construction

Sworn to and subscribed before me this first day of August, 1980.

Franklin Muray Notary Public

My commission expires: October 4, 1981

JHE/jc (783-887) Attachment

cc: Mr. J. D. Neighbors (NRC) Mr. J. P. O'Reilly (NRC-I&E)

