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HOWE, P.W.

Clair oil in a Power & Liight Co.

RECIP NAME

RECIPIENT AFFILIATION

VARGA, S.A.

Operating Reactors Branch 1.

SUBJECT: Requests: for amend of Litense DPR-23 to, incorporate add1 action statement required to meet limiting conditions of operation.

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**CP&L**Carolina Power & Light Company

January 8, 1982

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Serial No.: NO-82-046

HE MUCLEAR REGULATORY COMMISSION DOCUMENT MANAGEMENT OR TIDC

Office of Nuclear Reactor Regulation
ATTN: 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 LICENSE AMENDMENT -LIMITING CONDITIONS OF OPERATION - OPERABILITY

Dear Mr. Varga:

## Summary

As per your requests of April 10, 1980 and November 18, 1981, and in accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). These revisions incorporate an additional action statement to complement those currently required to meet the Limiting Conditions of Operation (LCO).

## Detail

As you stated in your requests, several specifications related to safety related equipment either do not provide for action to be taken if a component or system becomes inoperable or do not require additional action if a system becomes inoperable while its redundant system is already inoperable. We understand that your position is that without these action statements, we are required to initiate prompt reactor shutdown without any reaction time when redundant systems become inoperable. In order to meet the intent of your request, we propose to incorporate a general action statement at the beginning of Section 3.0 "Limiting Conditions for Operation." This action statement provides guidance to be followed when safety related systems or components without specific action statements become inoperable.

The affected page is attached for your review. Changes are indicated by vertical lines in the right hand margin.

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411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Mr. Steven A. Varga -2-January 8, 1982 In accordance with 10CFR170.22, we have determined that this revision constitutes a Class III Amendment. Accordingly, our check for \$4,000.00 is enclosed. If you have any further questions, please contact a member of our staff. Yours very truly, P. W. Howe Vice President Technical Services DCW/1r (4798) Enclosure cc: Mr. J. P. O'Reilly Mr. W. J. Ross Sworn to and subscribed before me this 8th day of January, 1982. Frankl Notary Public My commission expires: Oct. 4, 1986