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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
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 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Application for amend to License DPR-23, revising Tech Spec Figure 2.1-1 to include RCS min flow statement. Request supersedes 850828 application for amend. Application fee included in previous submittal.

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Carolina Power & Light Company

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SERIAL: NLS-85-398

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
REACTOR COOLANT SYSTEM MINIMUM FLOW DOCUMENTATION

Dear Mr. Varga:

SUMMARY

Carolina Power & Light Company hereby requests revisions to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No 2 (HBR2) in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101. This request supersedes that made in a letter dated August 28, 1985. The original request added a statement in the basis of the TS identifying the value of the thermal design flow (TDF) used in the HBR2 Cycle 10 safety analysis. In response to NRC comments, this request changes the location of that note and places it on the figure in which the parameter is used.

SIGNIFICANT HAZARDS CONSIDERATION

Carolina Power & Light Company has reviewed this amendment in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed TS revision involves no significant hazards consideration. In part, this determination was based upon consideration of the guidance concerning application of this standard as provided through examples in the Federal Register on April 6, 1983 (48 FR 14864), "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration."

Since the addition of this information statement does not affect any requirements, limits, or actions stipulated in the TS, its inclusion is considered to be fundamentally administrative or editorial in nature. As such, it has been determined to present no significant hazards consideration by virtue of its direct correspondence to example (i) of the NRC published guidance.

That guidance states that the amendment would likely be found to involve no significant hazards consideration if it was "a purely administrative change to the TS: for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature."

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Furthermore, CP&L has reviewed the requested TS change in accordance with the criteria provided in 10 CFR 50.92. Specifically:

1. *Would the operation of the facility involve a significant increase in the probability or consequences of an accident previously evaluated:*
2. *Would the operation of the facility create the possibility of a new or different kind of accident from any accident previously evaluated?*
3. *Would operation of the facility involve a significant reduction in the margin of safety?*

In each case, it has been determined that inclusion of this information statement would not adversely affect the accident analysis or safety margins as currently defined. This change merely identifies and documents on the figure, a fundamental parameter upon which the safety limit curves provided by Figure 2.1-1 are predicated. This information does not affect any action statements, surveillance requirements, or other TS requirement. It serves only to identify the conditions under which the subject calculations were performed, thus allowing future users to verify applicability of the stipulated limits to the flow conditions of the plant at that time. As such, addition of this statement to Figure 2.1-1 of the TS does not affect any existing accident analysis, create any possible new accidents, or significantly reduce any defined margin of safety. Therefore, this amendment request does not constitute a Significant Hazards Consideration.

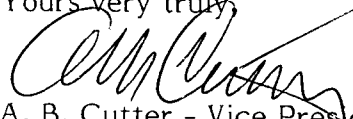
ADMINISTRATIVE

The affected page is included in Enclosure 1 for your use.

The \$150 license application fee was included in the previous submittal, in accordance with 10 CFR 170.12.

If you have any questions concerning this request, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,



A. B. Cutter - Vice President
Nuclear Engineering & Licensing

BAT/ccc (2098BAT)

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is 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.


Notary (Seal)

My commission expires: 5/18/88

