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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
 AUTH. NAME AUTHOR AFFILIATION  
 CUTTER, A. B. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Application for amend to License DPR-23, changing Tech Specs  
 to specify distance of 18 inches between dose-rate  
 measurements to determine whether accessible area is high  
 radiation area or locked high radiation area. Fee paid.

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Carolina Power & Light Company

SERIAL: NLS-86-305

SEP 4 1986

Director of Nuclear Reactor Regulation  
Attention: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing - A  
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  
LOCKED HIGH RADIATION AREAS

Dear Sir:

Carolina Power & Light Company (CP&L) hereby requests a revision 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.

#### SUMMARY

Technical Specifications 6.13.1.a and 6.13.1.b presently do not specify a distance at which dose rates must be measured for determining whether an area is a High Radiation Area (HRA) or a Locked High Radiation Area (LHRA). This change would specify a distance of 18 inches for such measurements in accordance with the Standard Technical Specifications (STS).

#### DISCUSSION

At the present time, HBR2 TS require any accessible area with radiation levels greater than 1000 mr/hr to be considered a LHRA. A Radiation Control (RC) Technician must be present at all times when work is being done. In a HRA, the RC Technician is not required, but all other aspects of radiological controls in the area are the same. A survey meter and Radiation Work Permit are required in both areas.

The STS define LHRAs using an 18-inch measurement criteria. Specification 6.12 states, "areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 inches) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or health physics supervision." Carolina Power & Light Company would like to adopt the STS definition in order to add clarity and avoid misunderstanding of the existing specification.

#### SIGNIFICANT HAZARDS CONSIDERATION

Carolina Power & Light Company has reviewed the 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

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examples in the Federal Register on April 6, 1983 (48 FR 14864), "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration."

Furthermore, CP&L has reviewed the requested TS change with the criteria provided in 10 CFR 50.92. Discussion of each of the three significant hazards consideration standards follows:

1. *Would the operation of the facility involve a significant increase in the probability or consequences of an accident previously evaluated?*

This change affects posting of areas for radiation hazards and does not impact the operation of the plant. Therefore, there would be no significant increase in the probability or consequences of an accident.

2. *Would operation of the facility create the possibility of a new or different kind of accident from any accident previously evaluated?*

As stated above, this change does not impact the operation of the plant. No new or different accidents could occur as a result of changing these definitions. Therefore, there would be no possibility of a new or different kind of accident.

3. *Would operation of the facility involve a significant reduction in a margin of safety?*

The margin of safety would not be significantly reduced by this change. In fact, access to key areas of the plant may be enhanced and worker exposure would be reduced, thereby, contributing to improved margin of safety.

#### ADMINISTRATIVE

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

In accordance with 10 CFR 170.12, a check in the amount of \$150 in payment of a license amendment application fee is attached.

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

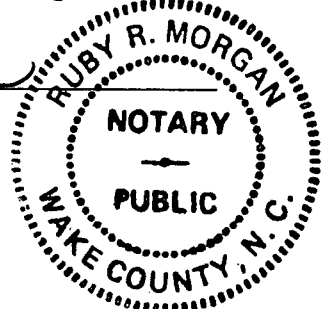
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Attachment

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

My commission expires: 11/27/89

  
Notary (Seal)



ENCLOSURE 1  
REVISED PAGES