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 CUTTER, A.B.    Carolina Power & Light Co.  
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SUBJECT: Application for amend to License DPR-23, revising TS Table 4.1-2.

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**Carolina Power & Light Company**

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SERIAL: NLS-89-118  
10CFR50.

A. B CUTTER  
Vice President  
Nuclear Services Department

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENDMENT

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specification (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed revision incorporates the existing, approved surveillance program for diesel fuel into Technical Specification Table 4.1-2.

The incorporation of a Technical Specification surveillance for fuel oil is solely an administrative change. The surveillance is presently required and controlled by the following procedures:

1. CP-001, Chemistry Monitoring Program, Attachment 11.3, Monthly Chemistry Report, requires monthly sampling of the Unit 2 (U-2) diesel fuel storage tank and provides the oil quality criteria to be met.
2. OP-909, Fuel Oil System, is the operating procedure providing instructions for transferring fuel oil to the U-2 diesel fuel oil storage tank from other on-site fuel oil storage tanks and tank trucks. For each source's procedure, sampling of the source fuel oil quality, with appropriate acceptance criteria noted, is required prior to transfer operations beginning.

This present methodology of sampling was reviewed and approved by NRC in correspondence from S. A. Varga to J. A. Jones dated December 10, 1981. These issues were readdressed in CP&L's response to proposed Violation 50-261/87-06-11 dated August 12, 1988.

SIGNIFICANT HAZARDS ANALYSIS

Carolina Power & Light Company has reviewed the subject TS change request in accordance with the standards set forth in 10CFR50.92 and determined that this change does not constitute a significant hazard based upon the following considerations:

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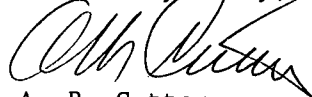
1. Operation of the facility, in accordance with the proposed amendment, would not involve a significant increase in the probability or consequences of an accident previously analyzed because no changes are being made to the plant equipment or procedures. The change is administrative in that it incorporates previously approved requirements into the Technical Specifications. The inclusion of the surveillance requirements into Technical Specifications does not change the sampling methodology or frequency. It also does not change the existing facilities as described in the UFSAR.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated because the previously approved sampling requirements are not changing. The change is administrative in that it incorporates previously approved requirements into the Technical Specifications. The inclusion of the surveillance requirements into Technical Specifications does not change the sampling methodology or frequency. It also does not change the existing facilities as described in the UFSAR.
3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety because no changes to the previously approved sampling criteria are being made. The change is administrative in that it incorporates previously approved requirements into the Technical Specifications. The inclusion of the surveillance requirement to Technical Specifications does not change the sampling methodology or frequency. It also does not change the existing facilities as described in the UFSAR.

ADMINISTRATIVE

The TS pages reflect the proposed change is provided for your use; changes are indicated by a single bar in the right margin.

If you have any questions concerning this request, please contact Mr. L. I. Loflin at (919) 546-6242.

Yours very truly,



A. B. Cutter

JSK/lah (313CRS)

cc: Mr. S. D. Ebnetter  
Mr. L. Garner (NRC - HBR)  
Mr. R. Lo  
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: 6-7-93

