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SUBJECT: Forwards revised info re license amend request to allow receipt of fuel w/nominal 4.2% enrichment of U-235.

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Carolina Power & Light Company

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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
REVISED INFORMATION CONCERNING LICENSE AMENDMENT REQUEST

Gentlemen:

Carolina Power & Light requested a license amendment to allow receipt of fuel with a nominal 4.2% enrichment of U-235 by letter dated August 4, 1989. As a result of discussion with the Project Manager, we are submitting a revised discussion for Question 3 of the Significant Hazards Analysis (attached). This change expands the discussion of the impact on the margin of safety.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,

A. B. Cutter

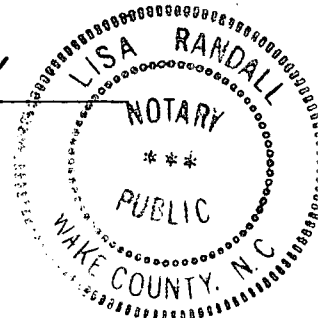
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cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC - HBR)
Mr. R. Lo
Mr. Heyward G. Shealy (SC)
Attorney General (SC)

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.

My commission expires: 6-7-93

Notary (Seal)



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Attachment

3. Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety.

The applicable margins are related to the radiological impact to the general public and the requirements on subcriticality in the new fuel storage and spent fuel storage racks. The subcriticality requirement for the new fuel rack is that the fuel rack K_{eff} remain <0.98 with optimum moderation and <0.95 for fully flooded with unborated water. The subcriticality requirement for the spent fuel racks is that the fuel rack K_{eff} remain <0.95 . Although it would be expected that use of higher enriched fuel would result in a small decrease in the margin to the limits, the analyses in support of this amendment request demonstrate that these criteria are met. The radiological impacts presented in the FSAR remain applicable and are well within the guidelines of 10CFR100. In addition, a cycle-specific safety evaluation is performed to verify that the fuel as arranged in the final core design continues to meet the acceptance criteria in the existing safety analyses. Therefore, operation in accordance with the proposed amendment does not involve a significant reduction in a margin of safety. In addition, this change closely resembles example [vi] of Examples of Amendments that are Considered not Likely to Involve Significant Hazards Considerations ... published in the Federal Register on March 6, 1986: "A change which ... may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan".