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TO: MR R W REID

FROM: CAROLINA POWER & LIGHT CO
RALEIGH, NC
E E UTLEY

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7-12-76

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DESCRIPTION
LTR RE THEIR 5-13-76 LTR.....FURN ADDITIONAL
INFO REGARDING TECH SPEC CHANGE REQUEST ON
F(Z)S(Z) SURVEILLANCE.....

ENCLOSURE

ACKNOWLEDGED

DO NOT REMOVE

PLANT NAME: H. B. Robinson #2

(2 pg)

SAFETY

FOR ACTION/INFORMATION

ENVIRO

7-20-76 RB

ASSIGNED AD:
BRANCH CHIEF: (6) REID
PROJECT MANAGER:
LIC. ASST.: (17) INGRAM

ASSIGNED AD:
BRANCH CHIEF:
PROJECT MANAGER:
LIC. ASST.:

INTERNAL DISTRIBUTION

<input checked="" type="checkbox"/> REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
<input checked="" type="checkbox"/> I & E	SCHROEDER	BENAROYA	DENTON & MULLER
<input checked="" type="checkbox"/> OELD		LAINAS	
GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACCARRY	KIRKWOOD	ERNST
CASE	KNIGHT		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
HOUSTON	ROSZTOCZY	BAER	
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLMER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		J. COLLINS
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION

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<input checked="" type="checkbox"/> TIC:	REG. VIE	ULRIKSON(ORNL)
<input checked="" type="checkbox"/> NSIC:	LA PDR	
ASLB:	CONSULTANTS	
ACRS 16 CYS WWW/SENT		

CONTROL NUMBER

7054

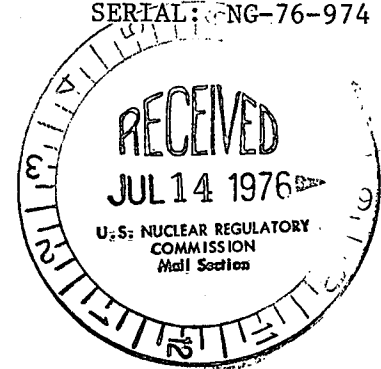
CP&L

Carolina Power & Light Company

FILE: NG-3514(R)



SERIAL: NG-76-974



Director of Nuclear Reactor Regulation
 ATTN: Robert W. Reid, Chief
 Operating Reactors Branch, No. 4
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

H. B. ROBINSON UNIT NO. 2
 DOCKET NO. 50-263
 LICENSE NO. DPR-23

ADDITIONAL INFORMATION REGARDING TECHNICAL SPECIFICATION
 CHANGE REQUEST ON F(Z)S(Z) SURVEILLANCE

Dear Mr. Reid:

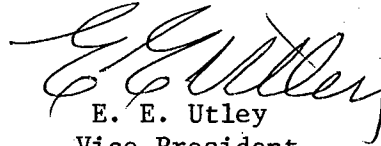
By letter of May 13, 1976, Carolina Power & Light Company (CP&L) requested a change to the H. B. Robinson Unit No. 2 Technical Specifications to make Section 4.11.2 consistent with Section 3.10.2.1.1 regarding applicability during physics tests and excore calibrations. The following information is provided to further clarify the intent and necessity of this request.

The change requested would modify Section 4.11.2 to provide for axial surveillance of F(Z)S(Z) except during physics tests and excore calibrations. This modification allows exceptions for the operation of the Axial Power Distribution Monitoring System (APDMS) which should be allowed in the interest of plant safety and performance.

The APDMS is an interim surveillance system and is supplemental to the constant axial offset control (CAOC) procedure that is defined in Section 3.10.2 of the Technical Specifications. APDMS utilizes two movable detectors from the Flux Mapping System to monitor selected thimbles in the reactor core for the determination of $F_0(Z)$. Typically, during certain physics tests and/or excore calibration, the complete Flux Mapping System including the detectors used for APDMS are utilized. Any requirement that would utilize the movable detectors of the Flux Mapping System for surveillance other than flux mapping, would prolong the physics tests and/or the excore calibration procedure. Prolonging the testing procedure would affect the xenon distribution that the CAOC procedure attempts to control. As stated in the basis for CAOC, on Page 3.10-12 of the Technical Specifications, "Strict control of the flux difference is not possible during certain physics tests, . . . , or during the required periodic excore calibration which requires larger flux differences than permitted." These exceptions for power distribution control are allowed due to the extremely low probability of a significant accident occurring during these operations.

The physics tests and excore calibrations are of short duration and are performed under controlled conditions. They are monitored by a trained reactor engineer stationed in the control room and will be terminated if any unsafe conditions or trends are noted.

Yours very truly,



E. E. Utley
Vice President
Bulk Power Supply

MFP/nja

cc: Mr. Norman C. Moseley