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TO: Mr. Robert W. Reid

FROM: CP&L, Raleigh, N. C. 27602, E. E. Utley

DATE OF DOCUMENT: 09/09/77

DATE RECEIVED: 09/12/77

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ENCLOSURE: Licensee No. DPR-23 Appl for Amend: tech specs proposed change concerning removal reference to Regulatory Guide 1.16 Section 6.9.1 with the enclosed attached replacement pages...

10p

PLANT NAME: H. B. ROBINSON UNIT # 2
jcm 09/12/77

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Carolina Power & Light Company

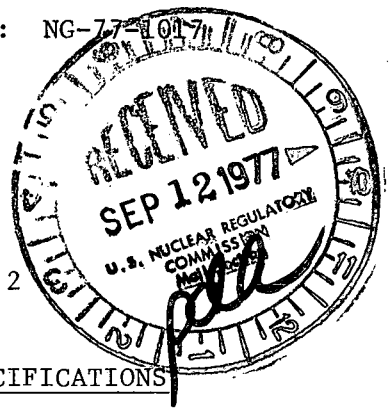
September 9, 1977

FILE: NG-3514 (R) SERIAL: NG-77-1017

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

File Cy

Regulatory



RE: H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT - REVISION OF TECHNICAL SPECIFICATIONS

Dear Mr. Reid:

As requested by your letter of August 4, 1977 and in accordance with the Code of Federal Regulations, Title 10, Parts 2.101 and 50.90, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications for its H. B. Robinson Steam Electric Plant, Unit No. 2. This revision has been prepared to remove reference to Regulatory Guide 1.16, as you requested.

Accordingly, it is requested that section 6.9.1 be revised as indicated on the attached replacement pages. Changes are indicated by a vertical line in the margin of each page. The attached replacement pages are in the format of the retyped Technical Specifications submitted by CP&L on August 13, 1976. To incorporate this revision, pages 6.1-1 through 6.9-11 should be replaced by the attached pages 6.9-1 through 6.9-10.

Yours very truly,

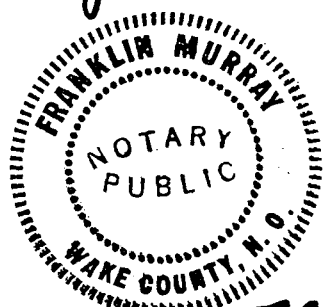
E. E. Utley
Senior Vice President
Power Supply

WH/DLB/gsm
Attachment

Sworn to and subscribed before me this 9th day of September, 1977.

Franklin Murray
Notary Public

My Commission Expires: October 4, 1981



336 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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6.9 REPORTING REQUIREMENTS

Information to be reported to the Commission, in addition to the reports required by Title 10, Code of Federal Regulations, shall be as indicated in the following sections. Reports shall be addressed to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

6.9.1 Routine Reports

a. Startup Report. A summary report of plant startup and power escalation shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

b. Annual Operating Report. Routine operating reports covering the operation of the unit during the previous calendar year shall be submitted prior to March 1 of each year. The initial

report shall be submitted prior to March 1 of the year following initial criticality.

The primary purpose of annual operating reports is to permit annual evaluation by the NRC staff of operating and maintenance experience throughout the nuclear power industry. The annual operating reports shall provide a comprehensive summary of the operating experience gained during the year, even though some repetition of previously reported information may be involved. References in the annual operating report to previously submitted reports shall be clear.

Each annual operating report shall include:

(1) A narrative summary of operating experience during the report period relating to safe operation of the facility, including safety-related maintenance not covered in 6.9.1(2)(e) below.

(2) For each outage or forced reduction in power-[1/] of over twenty percent of the rated thermal power where the reduction extends for greater than four hours:

(a) the proximate cause and the system and major component involved (if the outage or forced reduction in power involved equipment malfunction):

1/ The term "forced reduction in power" is defined as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.

(b) a brief discussion of (or reference to reports of) any reportable occurrences pertaining to the outage or power reduction;

(c) corrective action taken to reduce the probability of recurrence, if appropriate:

(d) operating time lost as a result of the outage or power reduction (for scheduled or forced outages, 2/ use the generator off-line hours; for forced reductions in power, use the approximate duration of operation at reduced power);

(e) a description of major safety-related corrective maintenance performed during the outage or power reduction, including the system and component involved and identification of the critical path activity dictating the length of the outage or power reduction; and

(f) a report of any single release of radioactivity or single radiation exposure specifically associated with the outage which accounts for more than 10% of the allowable annual values.

(3) A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, 4/ e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions

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2/ The term "forced outage" is defined as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.

4/ This tabulation supplements the requirements of §20.407 of 10CFR Part 20.

may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific work functions.

(4) Indications of failed fuel resulting from irradiated fuel examinations, including eddy current tests, ultrasonic tests, or visual examinations completed during the report period.

c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, with a copy to the NRC Regional Office, to be submitted no later than the tenth of each month following the calendar month covered by the report.

6.9.2 Reportable Occurrences

The Reportable Occurrences of Specifications 6.9.2.a and 6.9.2.b below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of the occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference made to the original report date.

a. Prompt Notification With Written Followup. The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the appropriate Regional Office of Inspection and Enforcement or his designate no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy fo the licensee event report form.

Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

(1) Failure of the reactor protection system, or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the Technical Specifications or failure to complete the required protective function.

Note: Instrument drift discovered as a result of testing need not be reported under this item (but see 6.9.2.a(5), 6.9.2.a(6), and 6.9.2.b(1) below.

(2) Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications.

Note: If specified action is taken when a system is found to be operating between the most conservative and least conservative aspects of a limiting condition for operation listed in the Technical Specifications, the limiting condition for operation is not considered to have been violated and no report need be submitted under this section (but see 6.9.2.b(2) below).

(3) Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary or primary containment.

Note: Leakage of valve packing or gaskets within the limits for identified leakage set forth in Technical Specifications need not be reported under this section.

(4) Reactivity anomalies involving disagreement with predicted value of reactivity balance under steady state conditions during power operation greater than or equal to 1% Δk/k; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the Technical Specifications; short-term reactivity increases that correspond to a reactor startup rate greater than 5 dpm, or if subcritical, an unplanned reactivity insertion of more than 0.5% Δk/k; or any unplanned criticality.

(5) Failure or malfunction to one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.

(6) Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.

Note: For 6.9.2a(5) and 6.9.2.a(6) reduced redundancy that does not result in loss of system function need not be reported under this section (but see 6.9.2.b(2) and 6.9.2.b(3) below).

(7) Conditions arising from natural or man-made events that, as a direct result of the event, require plant shutdown, operation of safety systems, or other protective measures required by Technical Specifications.

(8) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the Technical Specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.

(9) Performance of structures, systems or components that require remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or Technical Specifications bases or discovery during plant life of conditions not specifically considered in the safety analysis report or Technical Specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

Note: This item is intended to provide for reporting of potentially generic problems.

b. Thirty-day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the Director of the appropriate NRC Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of the licensee event report form, used for entering data into the NRC's computer-based file of information concerning licensee events. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

(1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems (but see 6.9.2.a(1) and 6.9.2.a(2) above).

(2) Conditions leading to oepration in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation (but see 6.9.2.a(2) above).

Note: Routine surveillance testing, instrument calibration or preventive maintenance which

require system configurations described in 6.9.2.b(1) and 6.9.2.b(2) above need not be reported except where test results themselves reveal a degraded mode as described above.

(3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems (but see 6.9.2.a(6) above).

(4) Abnormal degradation of systems other than those specified in 6.9.2.a(3) above designed to contain radioactive material resulting from the fission process.

Note: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limits for identified leakage set forth in Technical Specifications need not be reported under this item.

6.9.3 Special Reports

Special reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

	Area	Reference	Submittal Date
a.	Containment Leak Rate Testing	4.4	Upon completion of each test
b.	Initial Containment Structural Test	4.4	Within three months following completion of test
c.	Fuel Inspection	2.1	Upon completion of the inspection at second and third refueling outages

d.	Inservice Inspection	4.2	After five years of operation
e.	Containment Sample Tendon Surveillance	4.4	Upon completion of the inspection at 5 and 25 years of operation
f.	Post-operational Containment Structural Test	4.4	Upon completion of the test at 3 and 20 years of operation

References

(1) A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

(2) Much of the information in the Annual Report was previously submitted in a Semiannual Report.

(3) The term "forced reduction in power" is normally defined in the electric power industry as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.

(4) The term "forced outage" is normally defined in the electric power industry as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.

(5) Instruction Manual, Licensee Event Report File, Office of Management Information and Program Control, USNRC, Washington, D. C. 20555.

* Regulatory Guide 1.16, "Reporting of Operating Information Appendix A Technical Specifications," Revision 4.