

## **NRR-PMDAPEm Resource**

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**From:** Galvin, Dennis  
**Sent:** Thursday, October 27, 2016 2:31 PM  
**To:** Pilo, Tony  
**Subject:** Robinson 24-Month Fuel Cycle SR LAR - Supplemental Information Request (MF8385)  
**Attachments:** Robinson 24-Month Fuel Cycle LAR - Non-Accept with Opp to Supplement Draft  
2016-10-27 MF8385.pdf

Mr. Pilo,

During the staff's acceptance review the staff identified additional information required for the application to be acceptable for review. The attached is a draft of the staff's information request. The staff would like to discuss the attached information by November 3, 2016, so let me know what time will work for conducting a teleconference. If you have any questions let me know.

Sincerely

Dennis Galvin  
Project Manager  
U.S Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Division of Operating Reactor Licensing  
Licensing Project Branch 2-2  
301-415-6256

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3130

**Mail Envelope Properties** (Dennis.Galvin@nrc.gov20161027143100)

**Subject:** Robinson 24-Month Fuel Cycle SR LAR - Supplemental Information Request (MF8385)  
**Sent Date:** 10/27/2016 2:31:17 PM  
**Received Date:** 10/27/2016 2:31:00 PM  
**From:** Galvin, Dennis  
**Created By:** Dennis.Galvin@nrc.gov

**Recipients:**  
"Pilo, Tony" <Tony.Pilo@duke-energy.com>  
Tracking Status: None

**Post Office:**

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MESSAGE	615	10/27/2016 2:31:00 PM
Robinson 24-Month Fuel Cycle LAR - Non-Accept with Opp to Supplement Draft 2016-10-27 MF8385.pdf		
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**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

Mr. R. Michael Glover  
Site Vice President  
H. B. Robinson Steam Electric Plant  
Duke Energy Progress, LLC  
3581 West Entrance Road, RNPA01  
Hartsville, SC 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: AMENDMENT REQUEST FOR TECHNICAL SPECIFICATION CHANGE TO CHANGE TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT FREQUENCIES TO SUPPORT 24-MONTH FUEL CYCLES (CAC NO. MF8385)

Dear Mr. Glover:

By letter dated September 16, 2016, Duke Energy Progress, LLC (previously Duke Energy Progress, Inc.) (the licensee), submitted a license amendment request (LAR) for H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The proposed amendment request would revise certain Technical Specification (TS) surveillance requirement frequencies from 18 months to 24 months in support of a 24-month fuel cycle. The LAR also proposes comparable changes to applicable TS administrative control programs. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the TSs) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure by November XX, 2016.

R. Glover

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This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this letter were discussed with Tony Pilo of your staff on October XX, 2016.

If you have any questions, please contact the Robinson Project Manager, Dennis Galvin, at (301) 415-6256.

Sincerely,

Dennis J. Galvin, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure:  
Supplemental Information Needed

cc w/encl: Distribution via Listserv

R. Glover

- 2 -

be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this letter were discussed with Tony Pilo of your staff on October XX, 2016.

If you have any questions, please contact the Robinson Project Manager, Dennis Galvin, at (301) 415-6256.

Sincerely,

Dennis J. Galvin, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure:  
Supplemental Information Needed

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NAME	MWaters	JDion	DGalvin	
DATE				

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SUPPLEMENTAL INFORMATION NEEDED

AMENDMENT REQUEST REGARDING CHANGE TO TECHNICAL SPECIFICATION

SURVEILLANCE REQUIREMENT FREQUENCIES TO SUPPORT 24-MONTH FUEL CYCLES

DUKE ENERGY PROGRESS, LLC

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

1. By letter dated September 16, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16260A246), Duke Energy Progress LLC (previously Duke Energy Progress, Inc.) (the licensee), submitted a license amendment request (LAR) to change the technical specification (TS) surveillance requirement (SR) frequencies to support a 24-month fuel cycle. The license stated that the LAR was prepared in accordance with Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991 (ADAMS Accession No. ML031140501).

The licensee divided the proposed TS change into the following two categories: (1) changes to surveillance frequencies other than channel calibrations, identified as "Non-Calibration Changes," and (2) changes involving the channel calibration frequency identified as "Channel Calibration Changes." The fifth paragraph and Enclosure 1 of GL 91-04 provide guidelines regarding Non-Calibration Changes. The fourth paragraph and Enclosure 2 of GL 91-04 provide guidelines regarding Channel Calibration Changes.

Section 4.2 of the LAR provides a general discussion of the evaluations performed regarding channel calibration changes while Attachment 6 of the LAR provides the evaluations for the applicable SRs regarding channel calibration changes. Section 4.1 of the LAR provides a general discussion of the evaluations performed regarding non-calibration changes but the evaluations for the applicable SRs are not provided. Attachment 6 indicates that it addresses channel calibration changes and does not mention non-calibration changes. The NRC staff notes that the licensee did not follow the approach in the identified precedent regarding Oconee Nuclear Station, submittal dated May 6, 2010, or other similar submittals.

To begin its review, the U.S. Nuclear Regulatory Commission (NRC) staff needs the evaluations for the applicable non-calibration changes similar to what was provided in Attachment 6 for the channel calibration changes. The evaluations should address the fifth paragraph and Enclosure 1 of GL 91-04.

- 1) Licensees should evaluate the effect on safety of an increase in 18-month surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small.

Enclosure

- 2) Licensees should confirm that historical plant maintenance and surveillance support this conclusion.
- 3) Licensees should confirm that the assumptions in the plant licensing basis would not be invalidated on the basis of performing any surveillance at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle.

In addition, Section 4.1 of the LAR states that there was no evidence of repetitive failures or failures with a time-based failure mechanism. However, no basis was provided for this statement. To support this statement, the failure history of each changed 18-month non-calibration SR should be included in the evaluations previously discussed.

2. The licensee stated in the transmittal letter of the LAR that it was requesting approval for a change to Administrative Controls Section TS 5.5.17, "Ventilation Filter Testing Program." In the summary description of the proposed changes in Section 1 of the Enclosure of the LAR, the licensee stated that it was proposing a change to Administrative Controls Section, TS 5.5.12, "Ventilation Filter Testing Program." However, the "Ventilation Filter Testing Program," is in Administrative Controls Section, TS 5.5.11, not in TSs 5.5.12 or 5.5.17. Further in the detailed description of proposed changes in Section 3 of the Enclosure and in the TS markups, the licensee proposed changes to TS 5.5.17, "Control Room Envelope Habitability Program," not to the "Ventilation Filter Testing Program." Based on these inconsistencies, the proposed changes to the TS are unclear.
  - a) Clarify whether the licensee is proposing changes to TS 5.5.11 and if so, ensure that these changes are fully described, including providing applicable markups to the TS.
  - b) In Attachment 5 to the LAR, the licensee proposed to revise the plant commitment to Regulatory Guide (RG) 1.52, "Design, Inspection and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants," Revision 2, dated March 1978 (ADAMS Accession No. ML003740139), in the Updated Final Safety Analysis Report (UFSAR), as appropriate, to address the revised testing frequencies. However, no corresponding change is proposed to the reference to RG 1.52 in TS 5.5.11. This would create an inconsistency between the TS and the UFSAR. Provide a resolution to the proposed inconsistency.
3. In response to GL 91-04, Enclosure 2, Step 4, the licensee states the following in part in Enclosure 1 of the LAR.

The projected drift values determined by the calculations have been compared to the values used in the corresponding uncertainty/setpoint calculations. The uncertainty/setpoint calculations have been updated to address the comparisons. In no case was revision of a TS Setpoint or Allowable Value required. Also, no safety analysis was required to be revised.

As described in Branch Technical Position (BTP) 7-12, Revision 6, "Guidance on Establishing and Maintaining Instrument Setpoints" of the Standard Review Plan of "NUREG-0800 "Review of Safety Analysis Reports for Nuclear Power Plants," dated August 2016 (ADAMS Accession No. ML16019A200), the setpoint analysis methodology and assumptions should be reviewed by the NRC staff to confirm that an acceptable analysis method is used and that the analysis parameters and assumptions are consistent with the safety analysis, system design basis, technical specifications, plant design, and expected maintenance practices. The NRC staff requires this information as a basis to confirm with reasonable assurance that the TS setpoints, as a result of the SR changing from 18 to 24 months, continue to meet the guidance of Regulatory Guide 1.105 and are in compliant with 10 CFR 50.36(c). Therefore, the NRC staff requests that the licensee submit a representative instrument calculation supporting either TS 3.3.1, "Reactor Protection System (RPS) Instrumentation," or TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," that was updated as a result of the LAR.

Alternatively, a summary of the calculation, which documents the methodology, key assumptions, instrumentation data, and results in the calculation package, may be acceptable if the full calculation available within 30 days for subsequent audit.