



Ernest J. Kapopoulos, Jr.
H. B. Robinson Steam
Electric Plant Unit 2
Site Vice President

Duke Energy
3581 West Entrance Road
Hartsville, SC 29550

O: 843 857 1701
F: 843 857 1319

Ernie.Kapopoulos@duke-energy.com

APR 20 2017

10 CFR 50.90

Serial: RNP-RA/17-0031

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

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

ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST TO ADOPT
TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER 522, REVISION 0

REFERENCES:

1. Duke Energy letter, *Application to Revise Technical Specifications to Adopt TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 Hours per Month" Using the Consolidated Line Item Improvement Process*, dated September 27, 2016 (ML16273A042)

Ladies and Gentlemen:

By letter dated September 27, 2016, Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request for, among others, the H.B. Robinson Steam Electric Plant, Unit 2 (HBRSEP2) to adopt TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month." The proposed amendment would modify Technical Specification (TS) Surveillance Requirement (SR) 3.7.11.1 such that the Fuel Building Air Clean-Up System (FBACS) would be required to operate for 15 continuous minutes each month instead of 10 continuous hours each month.

Based on follow-up discussions with the Nuclear Regulatory Commission (NRC) staff, it was requested that Duke Energy provide additional detail regarding the SR 3.7.11.1 requirement to have the heaters operating automatically during this surveillance, and to provide detail regarding how the FBACS heaters are tested. This letter documents the discussion during the teleconference.

The FBACS system contains a duct-mounted electric heating coil that provides humidity control to enhance the efficiency of the carbon adsorber. The power supply to the heater box and exhaust fan (HVE-15A) is energized by a switch at the local control panel. Once the exhaust fan establishes air flow, an air flow sensing switch energizes the heater controls. During the

performance of SR 3.7.11.1 (monthly when the TS is applicable), Operations personnel verify power to the heaters via local indication in accordance with (IAW) Operations Procedure (OP)-906, "Heating, Ventilation, and Air Conditioning." Power to the heaters ensures that the three stages of heater output will automatically modulate based on feedback from a duct-mounted pneumatic humidity sensor located between the heater and the carbon adsorber. This ensures the moisture content of the air stream reaching the carbon adsorbers is below 70% relative humidity (RH).

The FBACS heater is also tested per TS 5.5.11, Ventilation Filter Testing Program (VFTP). Per TS 5.5.11.e, the heaters for the FBACS must be demonstrated to maintain the filter inlet air at less than or equal to 70% RH when tested IAW ANSI/ASME N510-1975. Visual inspections, a Power-Off continuity test using an ohmmeter, and a Power-On circuit test using an ammeter are performed with results provided back to the VFTP engineer. Satisfactory results are required as a prerequisite in Engineering Surveillance Test (EST)-022, "Once-Per-Cycle FBACS Performance Test." EST-022 also performs the air flow testing, differential pressure testing, Spent Fuel Pool Room negative pressure checks, and HEPA/Carbon filter testing to ensure operability of the FBACS system prior to refueling activities.

Should you have any questions regarding this matter, please contact Mr. Tony Pilo, Manager – Nuclear Regulatory Affairs at (843) 857-1409.

This document contains no new regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 20 April, 2017.

Sincerely,



Ernest J. Kapopoulos, Jr.
Site Vice President

EJK/jmw

c: Region Administrator, NRC, Region II
NRC Resident Inspector, HBRSEP
D. Galvin, NRR