UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 14, 2022

LICENSEE: Duke Energy Progress, LLC

FACILITY: H. B. Robinson Steam Electric Plant, Unit 2

SUBJECT: SUMMARY OF JUNE 7, 2022, PRE-SUBMITTAL MEETING WITH DUKE ENERGY PROGRESS, LLC TO DISCUSS A POTENTIAL LICENSE AMENDMENT REQUEST RE: PROPOSED TECHNICAL SPECIFICATION 3.3.2 FOR THE H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 (EPID L-2022-LRM-0041)

On June 7, 2022, an Observation Meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Duke Energy Progress, LLC (the licensee). This was a pre-submittal meeting to discuss a proposed license amendment request regarding a proposed change to Technical Specification (TS) 3.3.2, "Engineered Safety Feature Actuation System Instrumentation," to add a new function to Table 3.3.2-1 for feedwater isolation on steam generator level high-high for a future license amendment request concerning the H. B. Robinson Steam Electric Plant, Unit No. 2.

The meeting notice and agenda, dated March 19, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML22139A260 and are posted on the NRC's public Web page at http://www.nrc.gov/reading-rm/adams.html. The presentation material provided by the licensee are available in ADAMS (ML22151A265). Persons who do not have access to ADAMS or who encounter problems in accessing the meeting materials located in ADAMS should contact the NRC Public Document Room reference staff by telephone at 1-800-397-4209 or by e-mail to PDR.Resource@nrc.gov.

During the meeting, the licensee presented information regarding the proposed changes for TS 3.3.2. The licensee stated that the proposed revision would revise TS 2.1.1.1, "Reactor Core SLs," and TS 5.6.5.b, "Core Operating Limits Report (COLR)," to remove obsolete analytical methods no longer in use due to approval of new Duke Energy methods.

The NRC staff asked several clarifying questions which expanded the discussion on the licensee's methodology used to calculate the proposed Allowable Value and the calculations for the rack calibration accuracy. The NRC staffed asked for more insight regarding the as-found and as-left tolerance limits of the nominal trip setpoint calibrations.

Based on insight from the discussion, the licensee indicated that they would include the following as part of the final submittal of the license amendment request to the NRC:

1. A summary of the calculations used for the steam generator level high-high setpoint.
2. A statement about timeline for updating the non-conservative TS.

3. A summary of the calculations of the allowable value 76.16% calculated consistent with other Engineering Safety Features Actuation System setpoints.
4. Reference variations from the standard TS.
5. A statement discussing the note associated with Function 4C utilizing the existing Condition D on Table 3.3.2-1 is not applicable to the changes being requested.

No regulatory decisions were made during the meeting.

A list of the meeting attendees is enclosed. Members of the public were invited to attend, but there were no participants. No public meeting feedback forms were received. Please direct any inquiries to me at (301) 415-1387 or Tanya.Hood@nrc.gov.

Sincerely,

***/RA/***

Tanya E. Hood, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

JUNE 7, 2022, PRE-SUBMITTAL MEETING WITH DUKE ENERGY PROGRESS, LLC

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

POTENTIAL LICENSE AMENDMENT REQUEST

RE: TECHNICAL SPECIFICATION 3.3.2

| **Name** | **Organization** |
|---|---|
| Tanya Hood | U.S. Nuclear Regulatory Commission (NRC) |
| Nageswara Karipineni | NRC |
| Summer Sun | NRC |
| Hang Vu | NRC |
| Khadijah West | NRC |
| Jeff Abbott | Duke Energy Progress, LLC (Duke Energy) |
| Joshua Duc | Duke Energy |
| Brad Hearne | Duke Energy |
| Scott Jackson | Duke Energy |
| Fred Lane | Duke Energy |
| Christy Ray | Duke Energy |
| Ryan Treadway | Duke Energy |

Enclosure

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AdeJesus, OEDO
CNolan, OEDO

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|---|---|---|---|---|
| NAME | THood | RButler | VCusumano | MWaters |
| DATE | 06/22/2022 | 06/29/2022 | 06/30/2022 | 06/30/2022 |
| OFFICE | NRR/DSS/SCPB/BC | NRR/DSS/SNSB/BC | NRR/DORL/LPL2-2/BC | NRR/DORL/LPL2-2/PM |
| NAME | BWittick | SKrepel (CPeabody for) | DWrona (MMahoney for) | THood |
| DATE | 06/30/2022 | 07/6/2022 | 07/08/2022 | 07/14/2022 |

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