



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

January 19, 2023

Ms. Laura Basta  
Site Vice President  
H. B. Robinson Steam Electric Plant  
Duke Energy Progress, LLC  
3581 West Entrance Road, RNPA11  
Hartsville, SC 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 - ISSUANCE OF AMENDMENT NO. 274 REGARDING REVISION OF TECHNICAL SPECIFICATION 3.8.1 SURVEILLANCE REQUIREMENT 3.8.1.16 (EPID L-2022-LLA-0064)

Dear Ms. Basta:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 274 to Renewed Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). This amendment revises Robinson Surveillance Requirement (SR) 3.8.1.16 for Technical Specification (TS) 3.8.1, "AC [alternating current] Sources-Operating" in response to your application dated April 28, 2022, as supplemented by letter dated September 8, 2022. Specifically, the amendment removes the 4.160 kilovolt (kV) bus 2 requirement from SR 3.8.1.16 to verify automatic transfer capability of bus loads from the unit auxiliary transformer (UAT) to a startup transformer (SUT).

A copy of the related safety evaluation is enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Lucas Haeg, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

1. Amendment No. 274 to DPR-23
2. Safety Evaluation

cc: Listserv



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

DUKE ENERGY PROGRESS, LLC

DOCKET NO. 50-261

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

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 274  
Renewed License No. DPR-23

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Duke Energy Progress, LLC (the licensee), dated April 28, 2022, as supplemented by letter dated September 8, 2022, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 3.B. of Renewed Facility Operating License No. DPR-23 is hereby amended to read, in part, as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 274 are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 120 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

David J. Wrona, Chief  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Renewed Facility  
Operating License and  
Technical Specifications

Date of Issuance: January 19, 2023

ATTACHMENT TO LICENSE AMENDMENT NO. 274

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

RENEWED FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Replace the following page of Renewed Facility Operating License No. DPR-23 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Renewed Facility Operating License No. DPR-23

Remove

Insert

Page 3

Page 3

Replace the following page of the Appendix A, Technical Specifications with the attached revised page. The revised page is identified by amendment number and contain marginal lines indicating the areas of change.

Remove

Insert

3.8-12

3.8-12

- D. Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument and equipment calibration or associated with radioactive apparatus or components;
  - E. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by operation of the facility.
3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Section 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- A. Maximum Power Level

The licensee is authorized to operate the facility at a steady state reactor core power level not in excess of 2339 megawatts thermal.
  - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 274 are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

    - (1) For Surveillance Requirements (SRs) that are new in Amendment 176 to Final Operating License DPR-23, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 176. For SRs that existed prior to Amendment 176, including SRs with modified acceptance criteria and SRs whose frequency of performance is being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 176.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.15 (continued)</p> <p>5. supplies permanently connected and auto connected emergency loads for <math>\geq 5</math> minutes.</p>	
<p>SR 3.8.1.16</p> <p>-----NOTE-----</p> <p>1. This Surveillance shall not be performed in MODE 1 or 2.</p> <p>2. SR 3.8.1.16 is not required to be met if the 480 V Emergency bus 1 power supply is from a start up transformer.</p> <p>-----</p> <p>Verify automatic transfer capability of the 480 V Emergency bus 1 loads from the Unit auxiliary transformer to a start up transformer.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.1.17</p> <p>-----NOTE-----</p> <p>All DG starts may be preceded by an engine prelube period.</p> <p>-----</p> <p>Verify when started simultaneously from standby condition, each DG achieves, in <math>\leq 10</math> seconds, voltage <math>\geq 467</math> V and frequency <math>\geq 58.8</math> Hz, and after steady state conditions are reached, maintains voltage <math>\geq 467</math> V and <math>\leq 493</math> V and frequency <math>\geq 58.8</math> Hz and <math>\leq 61.2</math> Hz.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.1.18</p> <p>-----NOTE-----</p> <p>This Surveillance shall not be performed in MODE 1 or 2.</p> <p>-----</p> <p>Verify manual transfer of AC power sources from the normal offsite circuit to each alternate offsite circuit.</p>	<p>24 months</p>



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
 RELATED TO  
 AMENDMENT NO. 274 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-23  
 DUKE ENERGY PROGRESS, LLC  
 H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
 DOCKET NO. 50-261

<u>Application (i.e., initial and supplements)</u> <ul style="list-style-type: none"> <li>• April 28, 2022, Agencywide Documents Access and Management System (ADAMS) Accession No. ML22118A367</li> <li>• September 8, 2022 (ML22251A117)</li> </ul>	<u>Safety Evaluation Date</u> January 19, 2023 <hr/> <u>Principal Contributors to Safety Evaluation</u> <ul style="list-style-type: none"> <li>• Vijay Goel</li> <li>• Adakou Foli</li> </ul>
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1.0 INTRODUCTION

By letter dated April 28, 2022, (ML22118A367), Duke Energy Progress, LLC (Duke Energy, the licensee), submitted a license amendment request (LAR) to Renewed Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The LAR proposed a revision to Robinson Surveillance Requirement (SR) 3.8.1.16 for Technical Specification (TS) 3.8.1, “AC [alternating current] Sources-Operating.” Specifically, the revision would remove the 4.160 kilovolt (kV) bus 2 requirement from SR 3.8.1.16 to verify automatic transfer capability of bus loads from the unit auxiliary transformer (UAT) to a startup transformer (SUT).

In response to an NRC staff request for additional information (RAI, ML23011A015), the licensee provided supplemental information by letter dated September 8, 2022 (ML22251A117).

2.0 PROPOSED CHANGES

2.1 Current SR 3.8.1.16 and Proposed Changes

Robinson’s current SR 3.8.1.16 verifies automatic transfer capability of the 4.160 kV bus 2 and the 480 V Emergency bus 1 loads from the UAT to a SUT with a frequency in accordance with the Surveillance Frequency Control Program.

The licensee proposed changes to remove the requirement for 4.160 kV bus 2 from SR 3.8.1.16. An additional editorial change (“bus” in lower case in Note 2 of SR 3.8.1.16) was proposed for consistency. The changes to SR 3.8.1.16 are indicated by the deletion of existing text by strikeout and the addition of text in bold, as follows:

Proposed SR 3.8.1.16:

-----NOTE-----

1. This Surveillance shall not be performed in MODE 1 or 2.
2. SR 3.8.1.16 is not required to be met if ~~the 4.160 kV bus 2 and~~ 480 V Emergency bus 1 power supply is from a start up transformer.

-----  
Verify automatic transfer capability of the ~~4.160 kV bus 2 and the~~ 480 V Emergency bus 1 loads from the Unit auxiliary transformer to a start up transformer.

## 2.1 Reason for the Proposed Change

In Section 2.3 of the LAR, the licensee provided the following reason for the proposed change:

The current SR 3.8.1.16 requires automatic transfer capability of both the 4.160 kV bus 2 and 480 V [volt] Emergency bus 1 from the UAT to a SUT. However, normal electrical lineups exist such that 480 V Emergency bus 1 is already aligned to a SUT when 4.160 kV bus 2 is not. In this configuration, if equipment is taken out of service for maintenance that removes automatic transfer capability of 4.160 kV bus 2, the current SR 3.8.1.16 would not be met. SR 3.0.1 states that a failure to meet a SR is a failure to meet the LCO [limiting condition for operation].

## 3.0 REGULATORY EVALUATION

### 3.1 Description of Robinson Electrical Power System

In Section 2.1 of the LAR, the licensee provided the following description, in part, of the Robinson electrical power system:

The RNP [Robinson] Unit 2 Electrical Power Distribution System AC [alternating current] sources consist of the offsite power sources (preferred power sources), and the onsite standby power sources (Train A and Train B diesel generators (DGs)). As required by RNP design criteria, the design of the AC electrical power system provides independence and redundancy to ensure an available source of power to the Engineered Safety Feature (ESF) systems.

The onsite emergency AC Distribution System is divided into redundant load groups (trains) so that the loss of any one group does not prevent the minimum safety functions from being performed. Each train has connections to two preferred offsite power sources and a single DG.

Offsite power is supplied to the unit switchyard(s) from the transmission network by multiple transmission lines. From the switchyard(s), two electrically and physically separated circuits provide AC power, through two dedicated SUTs, to the 480 V ESF buses E1 and E2 (i.e., 480 V Emergency bus 1 and 480 V Emergency bus 2).



The 480 V Emergency bus 1 is normally powered from the 115 kV switchyard through the dedicated 115 kV SUT, 4.160 kV bus 6 and station service transformer (SST) 2F. The 480 V Emergency bus 2 is normally powered from the dedicated 230 kV SUT, 4.160 kV bus 9 and SST 2G. The 4.160 kV buses 1, 2, 4 and 5 are normally powered from the main generator via the UAT and 4.160 kV bus 3 is normally powered from the 115 kV SUT via 4.160 kV bus 8. Following a generator lockout, 4.160 kV buses 1 and 2 would automatically transfer to the 230 kV SUT via 4.160 kV bus 7, and 4.160 kV buses 4 and 5 would automatically transfer to the 115 kV SUT via 4.160 kV buses 8 and 3.

Upon a loss of either SUT, 480 V Emergency bus 1 would be powered from the main generator through the UAT and 4.160 kV bus 2 via a manual transfer. Upon a loss of the 230 kV SUT, 480 V Emergency bus 2 would be manually transferred to the 115 kV SUT via 4.160 kV bus 3. A detailed description of the offsite power network and the circuits to the ESF buses is found in the RNP Update [sic] Final Safety Analysis Report (UFSAR)<sup>[1]</sup>, Chapter 8.

A normal power feed of buses from offsite circuits at 100 percent power is shown in slide 6 of the pre-submittal presentation associated with this LAR dated March 30, 2022 (ML22083A107). According to the LAR, if a single SUT is out of service, the 480 V Emergency bus 1 would be powered from the UAT and the 480 V Emergency bus 2 would be powered from the remaining in-service SUT. Therefore, availability of the automatic transfer function is only needed in the electrical lineups where either a SUT is out of service (and the UAT is in-service). If both SUTs were out of service, transfer from the UAT to an SUT would serve no purpose.

### 3.2 Regulatory Requirements

The regulations in Title 10 of the Code of Federal Regulations (CFR) paragraph 50.36(c), require that TSs include items in five categories: (1) Safety limits, limiting safety system settings, and limiting control settings, (2) LCOs, (3) SRs, (4) Design features, and (5) Administrative controls. The proposed change specifically applies to 10 CFR 50.36(c)(3), which defines SRs as requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

Robinson received its construction permit in 1967 and was licensed for operation in July 1970. The plant's design approval for the construction phase was based on the proposed General Design Criteria (GDC) (hereinafter referred to as the "draft GDC"). On February 20, 1971, the Atomic Energy Commission published in the *Federal Register* (36 FR 3255) a final rule that added Appendix A to 10 CFR Part 50, "General Design Criteria for Nuclear Power Plants" (hereinafter referred to as the "final GDC"). Differences between the draft GDC and final GDC included a consolidation from 70 to 64 criteria. As discussed in the NRC Staff Requirements Memorandum for SECY-92-223, "Resolution of Deviations Identified during the Systematic Evaluation Program," dated September 18, 1992, the Commission decided not to apply the final GDC to plants with construction permits issued prior to May 21, 1971.

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<sup>[1]</sup> ML21147A414

Based on a review of the Robinson UFSAR, Section 3.1, "Conformance with General Design Criteria," the NRC staff identified draft GDC 39 as being applicable to the proposed amendment. The Robinson UFSAR, Section 3.1.2.39, "Emergency Power" (GDC 39), states, in part, that:

An emergency power source shall be provided and designed with adequate independency, redundancy, capacity, and testability to permit the functioning of the engineered safety features and protection systems required to avoid undue risk to the health and safety of the public. This power source shall provide this capacity assuming a failure of a single active component. (GDC 39).

### 3.0 TECHNICAL EVALUATION

Section 3.0 of the LAR stated, in part:

The design of the AC electrical power system ensures an available source of power to the ESF systems. An offsite circuit consists of all breakers, transformers, switches, interrupting devices, cabling, and controls required to transmit power from the offsite transmission network to the onsite ESF buses. In the normal operating lineup, this includes the circuit path from the 115 kV switchyard up to and including the feeder breaker to 480 V Emergency bus 1 via the 115 kV SUT and SST 2F and the circuit path from the 230 kV switchyard up to and including the feeder breaker to 480 V Emergency bus 2 via the 230 kV SUT and SST 2G. All safety related loads are supplied power from 480 V Emergency buses 1 and 2. The 4.160 kV buses provide the electrical flow path from the preferred offsite power source to the emergency buses; however, no safety related loads are supplied power directly from the 4.160 kV buses.

SR 3.8.1.16 was first added to the RNP TS under Amendment 176 (Reference 1 [ML020560172, ML14175A922, and ML14175A924]) [issued on October 24, 1997], which converted the RNP TS to improved Standard TS (STS). This original SR 3.8.1.16 wording did include 4.160 kV bus 2. Justification in the STS conversion package stated that SR 3.8.1.16 was being "added to verify the automatic transfer of the emergency bus E1 loads from the unit auxiliary transformer to the startup transformer." Note that 4.160 kV bus 2 is not mentioned in this justification.

Section 3.0 of the LAR also noted that Amendment 261 (ML18228A584), issued on September 10, 2018, added a second qualified offsite power circuit via a new 230 kV SUT, as well as four new 4.160 kV buses (buses 6, 7, 8, and 9). The licensee provided in the LAR Robinson's UFSAR Figure 8.1.2-1A, "One Line Diagram Unit 2 Auxiliary Distribution System," both before and after Amendment 261. The licensee described that for "the electrical configuration prior to TS Amendment 261, the direct feed of 4.160 kV power to 480 V Emergency bus 1 was 4.160 kV bus 2, such that power to 480 V Emergency bus 1 would always flow through 4.160 kV bus 2. Therefore, inclusion of 4.160 kV bus 2 in SR 3.8.1.16 did not create an issue prior to TS Amendment 261." Further, the licensee stated that "if 480 V Emergency bus 1 incurred an automatic transfer from the UAT to SUT, this would have included an automatic transfer of 4.160 kV bus 2 from the UAT to SUT. As a result of TS Amendment 261, the direct feed of 4.160 kV power to 480 V Emergency bus 1 was changed from 4.160 kV bus 2 to 4.160 kV bus 6. The required safety related loads fed from ESF buses must have power available to them for the qualified offsite circuits to be considered operable and for the

LCO to be met. SR 3.8.1.16 is specifically associated with ESF bus E1 (i.e., 480 V Emergency bus 1). In order to focus the SR 3.8.1.16 on the required safety loads to ensure that the LCO is met (i.e., the purpose of SRs), this amendment request proposes to remove 4.160 kV bus 2, rather than replace it with [any other upstream non-safety related bus, such as] 4.160 kV bus 6.”

The NRC staff determined that the current TS SR 3.8.1.16 was based on Robinson’s Amendment 176 in which transfer of power from UAT to SUT always included 4.160 kV bus 2, such that power to 480 V Emergency bus 1 would always flow through 4.160 kV bus 2. However, based on Robinson’s Amendment 261, the power to Emergency bus 1 normally does not flow through 4.160 kV bus 2.

In the September 8, 2022, supplement in response to an NRC staff RAI, the licensee provided the following clarification, in part:

There are no additional normal (i.e., 100% reactor power, no equipment out of service, offsite power provided via both SUTs, no diesel generator testing being performed) electrical lineups that exist besides the lineup described in the RAI citation of Section 2.1 of the LAR. Section 2.3 of the LAR intended to recognize that there are additional non-normal (but allowed by procedure) electrical lineups “such that 480 V Emergency bus 1 is already aligned to a SUT when 4.160 kV bus 2 is not.” As with the normal electrical lineup, these non-normal electrical lineups would not be required to meet the proposed SR 3.8.1.16 [in accordance with] the proposed SR 3.8.1.16, Note 2: “SR 3.8.1.16 is not required to be met if the 480 V Emergency bus 1 power supply is from a start-up transformer.”

Based on the information provided in the LAR and supplement, the NRC staff finds that 1) in normal configurations, the automatic transfer of power from UAT to a SUT via 4.160 kV bus 2 is not necessary to provide power to the 480 V Emergency bus 1 since bus 1 is already supplied power from a SUT, and 2) in non-normal configurations where 480 V Emergency bus 1 is not aligned to a SUT, the focus is needed for transfer of power automatically to the 480 V Emergency bus 1 rather to any specific upstream non-safety related 4.160 kV bus. Therefore, the staff finds that the proposed change to SR 3.8.1.16 (i.e., deletion of upstream non-safety related bus 4.160 kV bus 2 from TS SR 3.8.1.16) is acceptable since the non-safety-related 4.160 kV bus 2 is not required to meet the TS LCO 3.8.1. Further, this change is acceptable to the staff because it 1) adjusts SR 3.8.1.16 to include only the necessary components such that the LCO will be met, consistent with 10 CFR 50.36(c)(3), and 2) it does not require any design changes associated with the emergency power source or system, so the design remains consistent with GDC 39.

Regarding the associated editorial change (i.e., from “Bus” to “bus” in Note 2 of SR 3.8.1.16), the staff finds it acceptable as it will improve consistency within the SR with respect to how the term is displayed, and the change is non-technical in nature.

#### 4.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

NOTICES AND ENVIRONMENTAL FINDINGS  
 RELATED TO  
 AMENDMENT NO. 274 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-23  
 DUKE ENERGY PROGRESS, LLC  
 H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
 DOCKET NO. 50-261

<u>Application (i.e., initial and supplements)</u> <ul style="list-style-type: none"> <li>• April 28, 2022, Agencywide Documents Access and Management System (ADAMS) Accession No. ML22118A367</li> <li>• September 8, 2022 (ML22251A117)</li> </ul>	<u>Safety Evaluation Date</u> January 19, 2023
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1.0 INTRODUCTION

By letter dated April 28, 2022, (ML22118A367), Duke Energy Progress, LLC (Duke Energy, the licensee), submitted a license amendment request (LAR) to Renewed Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The LAR proposed a revision to Robinson Surveillance Requirement (SR) 3.8.1.16 for Technical Specification (TS) 3.8.1, “AC [alternating current] Sources-Operating.” Specifically, the revision removes 4.160 kilovolt (kV) bus 2 from SR 3.8.1.16 to verify automatic transfer capability of bus loads from the unit auxiliary transformer (UAT) to a startup transformer (SAT).

In response to an NRC staff request for additional information (RAI), the licensee provided supplemental information by letter dated September 8, 2022 (ML22251A117). The supplement did not expand the scope of the application as originally noticed and did not change the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff’s original proposed no significant hazards consideration determination as published in the *Federal Register* on July 15, 2022 (87 FR 42505).

2.0 STATE CONSULTATION

In accordance with the Commission’s regulations, the South Carolina State official was notified of the proposed issuance of the amendment on November 17, 2022. The State official had no comments.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes an SR. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding published in the *Federal Register* on July 15, 2022 (87 FR 42505). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 - ISSUANCE OF AMENDMENT NO. 274 REGARDING REVISION OF TECHNICAL SPECIFICATION 3.8.1 SURVEILLANCE REQUIREMENT 3.8.1.16 (EPID L-2022-LLA-0064) DATED JANUARY 19, 2023

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