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

August 14, 2024

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. 280 TO ADOPT TSTF-258-A, REVISION 4, REGARDING CHANGES TO TECHNICAL SPECIFICATION 5.7, "HIGH RADIATION AREA" (EPID L-2023-LLA-0140)

Dear Laura Basta:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 280 to Renewed Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). This amendment is in response to your submittal dated October 5, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23278A247).

Specifically, this amendment revises Robinson Technical Specification 5.7, "High Radiation Area," to be consistent with NRC-approved Technical Specifications Task Force (TSTF) Traveler 258 (TSTF-258-A), Revision 4, "Changes to Section 5.0, Administrative Controls" (ML040620102).

A copy of the Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

If you have any questions, please contact me at (301) 415-0272 or by e-mail at Lucas.Haeg@nrc.gov.

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

Enclosure:
1. Amendment No. 280 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. 280
Renewed License No. DPR-23

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by Duke Energy Progress, LLC (the licensee), dated October 5, 2023, 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. 280 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 WRONA

Digitally signed by DAVID WRONA
Date: 2024.08.14 14:26:46 -04'00'

David 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: August 14, 2024

ATTACHMENT TO LICENSE AMENDMENT NO. 280

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 pages of the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
5.0-29	5.0-29
5.0-30	5.0-30
	5.0-31
	5.0-32

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. 280 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.

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously displays radiation dose rates in the area, or

2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

(continued)

5.7 High Radiation Area (continued)

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:

1. All such door and gate keys shall be maintained under the administrative control of the shift manager, radiation protection manager, or his or her designee.

2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.

(continued)

5.7 High Radiation Area (continued)

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

(continued)

5.7 High Radiation Area (continued)

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 280

RENEWED FACILITY OPERATING LICENSE NO. DPR-23

DUKE ENERGY PROGRESS, LLC

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

DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated October 5, 2023 (Agencywide Document Access and Management System (ADAMS) Accession No. ML23278A247), Duke Energy Progress, LLC (Duke Energy, the licensee) submitted a license amendment request (LAR) for changes to the Technical Specifications (TSs) for H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The proposed amendment would revise Robinson TS 5.7, "High Radiation Area," to be consistent with the U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF) Traveler 258 (TSTF-258-A), Revision 4, "Changes to Section 5.0, Administrative Controls" (ML040620102). The NRC approved TSTF-258 on June 29, 1999 (ML16237A030).

Robinson has previously adopted Standard Technical Specifications (STS). The current revision is NUREG-1431, Revision 5, "Standard Technical Specifications – Westinghouse Plants," (ML21259A155). The TSTF process is an industry and NRC-controlled process for proposing and incorporating improvements to the STS. The purpose of the revision to Robinson's TSs proposed in this amendment is to ensure consistency with NUREG-1431 and TSTF-258-A, Revision 4.

TSTF-258-A, Revision 4, dated August 5, 2002, addressed changes in five parts to NUREG-1431, Revision 1, "Standard Technical Specifications (STS)-Westinghouse Plants." TSTF-258-A specified changes, in part, to STS Administrative Controls Section 5.7, "High Radiation Area [HRA]," that were based on the revised Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20 regulation. Revisions to Robinson's TSs proposed in this LAR was to ensure consistency with NUREG-1431 and TSTF-258-A, Revision 4.

2.0 REGULATORY EVALUATION

The NRC staff considered the following regulatory requirements and guidance during its review of the LAR.

Regulatory Requirements

Section 20.1101, “Radiation protection programs,” of 10 CFR Part 20, “Standards for Protection Against Radiation,” requires licensees to develop, document, and implement a radiation protection program appropriate to the scope of licensed activities and sufficient to ensure compliance with the provisions of 10 CFR Part 20. Section 20.2102, “Records of radiation protection programs,” of 10 CFR Part 20 requires licensees to maintain records of the radiation protection program.

The regulations in 10 CFR 20.1601, “Control of access to high radiation areas,” establish requirements for controlling access to HRAs. An HRA is defined, in 10 CFR 20.1003, as an area, accessible to individuals, in which radiation levels from radiation sources external to the body could result in an individual receiving a dose equivalent in excess of 0.1 roentgen equivalent man (rem) (1 mSv) in 1 hour at 30 centimeters from the radiation source or 30 centimeters from any surface that the radiation penetrates. Further, 10 CFR 20.1601(c) states that a licensee may apply to the Commission for approval of alternative methods for controlling access to HRAs.

The regulations in 10 CFR 50.36, “Technical specifications,” establish the requirements related to the content of TSs. In accordance with 10 CFR 50.36(c)(5), the TSs must include administrative controls, which “are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.”

Regulatory Guidance

Regulatory Guide (RG) 8.38, Revision 1, “Control of Access to High and Very High Radiation Areas in Nuclear Power Plants” (ML061350096), describes methods the NRC staff finds acceptable for implementing the requirements applicable to the control of access to high and very high radiation areas (VHRAs) in nuclear power plants. Section 2.2 of RG 8.38 describes acceptable methods of exerting positive access control over entries into HRAs. Section 2.4 of RG 8.38 describes an acceptable alternative method to 10 CFR 20.1601(a) for access control to HRAs.

The NRC staff’s guidance for the review of TSs is in Chapter 16.0, Revision 3, “Technical Specifications” (ML100351425), of NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: [Light-Water Reactor] LWR Edition,” (SRP). As described therein, as part of the regulatory standardization effort, the staff has prepared improved STS for each of the LWR nuclear steam supply systems and associated balance-of-plant equipment systems. NUREG-1431 is the NRC’s approved STS for Westinghouse-designed nuclear power plants such as Robinson. STS 5.7 provides the standard wording for HRA administrative controls approved under 10 CFR 20.1601(c).

3.0 TECHNICAL EVALUATION

3.1 Description of Proposed TS Changes

Robinson TS 5.7.1 currently states:

> In lieu of the “control device” or “alarm signal” required by paragraph 20.1601(a) of 10 CFR 20, each High Radiation Area in which the intensity of radiation is

1000 mRem/hour or less shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Radiation control personnel or personnel escorted by radiation control personnel shall be exempt from the RWP issuance requirements during the performance of their assigned duties within the RCA [Radiation Control Area], provided they comply with approved radiation protection procedures for entry into High Radiation Areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device provided for each individual that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are a are of them.

c. An individual qualified as a radiation control technician with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the radiation control supervisor in the RWP.

Robinson TS 5.7.2 currently states:

The requirements of 5.7.1 shall apply to each High Radiation Area in which the intensity of radiation is greater than 1000 mRem/hour at 30 centimeters (12 inches) from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or from any surface penetrated by the radiation. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the SS [shift supervisor] on duty and/or the radiation control supervisor. Entrance thereto shall also be controlled by requiring issuance of an RWP. The exemption from RWP issuance requirements discussed in 5.7.1 is not applicable for any High Radiation Area in which the intensity of radiation is greater than 1000 mRem/hour.

The proposed change replaces TS Sections 5.7.1 and 5.7.2 in their entirety as follows:

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously displays radiation dose rates in the area, or

2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 <u>High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation</u>

a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:

1. All such door and gate keys shall be maintained under the administrative control of the shift manager, radiation protection manager, or his or her designee.

2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.

b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

   (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

   (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the “As Low As is Reasonably Achievable” principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

3.2 Description of Variations

The LAR identified and described three variations between the proposed Robinson TS 5.7 and the markups provided in TSTF-258-A, Revision 4:

Variation 1

> The proposed Robinson TS 5.7.1.d, item 1, utilizes a comma (,) after "area" instead of the semicolon (;) utilized in TSTF-258-A. This punctuation change is an editorial difference to be consistent with other items in the TS 5.7.1.d list and does not affect the applicability of TSTF-258-A to the proposed change.

Variation 2

> The proposed Robinson TS 5.7.2.a, item 1, utilizes the title "shift manager" instead of the title "shift supervisor" utilized in TSTF-258-A. This is a change to reflect the title, as used by Duke Energy, of the position that would be designated for the key control function at Robinson and does not affect the applicability of TSTF-258-A to the proposed change.

Variation 3

> The TSTF-258-A TS 5.7.2.e contains an editorial error of an additional period (.) after the first sentence. This additional period is not included in the proposed Robinson TS 5.7. This is an editorial change and does not affect the applicability of TSTF-258-A to the proposed change.

In addition, the staff identified two variations between the proposed Robinson TSs and STS 5.7.2.a, item 1: the licensee's proposed Robinson TS 5.7.2.a, item 1, does not have an "and" at the end of the item [Variation 4] and uses the singular "designee" rather than the plural "designees" [Variation 5]. The licensee's proposed Robinson TS 5.7.2.a, item 1, is consistent with the wording of the equivalent provision in TSTF-258-A, Revision 4, but this wording differs from the equivalent provision in STS 5.7.2.a, as described above.

3.3 Review of Proposed Change to Robinson TS 5.7

The provisions of 10 CFR 20.1601 require licensees to control access to HRAs. As described in RG 8.38, in some instances, the requirements of 10 CFR 20.1601(a) may unnecessarily restrict nuclear plant operations. Accordingly, licensees may apply to the Commission for approval to use alternative methods for controlling access to HRAs under the provisions of 10 CFR 20.1601(c). These alternate controls constitute important aspects of the radiation protection programs required by 10 CFR 20.1101 because they function to prevent exposures in excess of regulatory limits. Reflecting their importance toward assuring safe operation of the facility, these alternate methods have historically been incorporated into the licensing bases as administrative controls TS per 10 CFR 50.36(c)(5).

The licensee has proposed to revise Robinson's TS 5.7 to provide alternate methods for controlling access to HRAs under the provisions of 10 CFR 20.1601(c). The licensee's proposed Robinson TS 5.7 is based on the version of TS 5.7 contained in TSTF-258-A, Revision 4 (ML040620102), as approved by the NRC in a letter dated June 29, 1999 (ML16237A030). Per Chapter 16.0 of the SRP, the staff evaluated Duke Energy's request by comparing the proposed

Robinson TS 5.7 to the versions of TS 5.7 contained in TSTF-258-A, Revision 4, and STS 5.7 in NUREG-1431.

3.3.1 Evaluation of Variations

As described in Section 3.2 above, the licensee identified in the LAR three variations from TS 5.7 as described in TSTF-258-A, Revision 4. Additionally, the staff identified in the LAR two variations from TS 5.7 as described in the STS. For the sake of completeness and consistent with SRP, Chapter 16.0, guidance, the staff evaluated all five deviations.

Evaluation of Variation 1

The staff finds that the variation is editorial in nature and does not affect the application of TS 5.7.1.d, item 1 as contained in TSTF-258-A, Revision 4. Additionally, the licensee's proposal is consistent with the formatting for STS 5.7.1.d as contained in NUREG-1431.

Evaluation of Variation 2

The staff finds that the variation is acceptable as it is necessary to conform with the licensee's organizational nomenclature and does not affect the application of TS 5.7.2.a, item 1.

Evaluation of Variation 3

The staff finds that the variation is editorial in nature and does not affect the application of TS 5.7.2.e, as contained in TSTF-258-A, Revision 4. Additionally, the licensee's proposal is consistent with the formatting for STS 5.7.2.e as contained in NUREG-1431.

Evaluation of Variation 4

The use of "and" after item 1 of STS 5.7.2.a is meant as a clarification that both items 1 and 2 are applicable whenever STS 5.7.2.a is applicable. This clarification was not included when TSTF-258-A, Revision 4 was originally approved. However, while the clarification is useful, it is not required to maintain the effectiveness of the TS because items 1 and 2 comprise an inclusive listing of requirements. Had the staff intended the listing to be exclusive, the individual items would have been distinguished using "or" between each item, as was done in TS 5.7.1.d of TSTF-258-A, Revision 4.

In conclusion, the staff finds that the licensee's proposed wording of Robinson TS 5.7.2.a is consistent with TSTF-258-A, Revision 4, and that its difference from STS 5.7.2.a does not affect the application of Robinson TS 5.7.

Evaluation of Variation 5

The staff finds that the licensee's proposed wording of a singular "designee" in the proposed Robinson TS 5.7.2.a, item 1, is consistent with TSTF-258-A, Revision 4, and that this non-technical difference from STS 5.7.2.a, item 1, does not affect the application of Robinson TS 5.7.

3.4 Technical Conclusion

The staff finds that the proposed TS 5.7 satisfies the requirements in 10 CFR 50.36. This conclusion is based on the staff's finding that the proposed TS complies with the NRC-approved TS as contained in TSTF-258-A, Revision 4, as well as guidance developed by the staff for plants designed by the Westinghouse, as in NUREG–1431, with appropriate modifications for plant-specific considerations.

Based on the evaluation of the variations in Section 3.3.1 above, the staff also finds that the variations comprise alternative phrasing that is equivalent to the reference TS phrasing and that the proposed TS language is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of South Carolina official was notified of the proposed issuance of the amendment on June 11, 2024. The State of South Carolina official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes the requirements with respect to installation or use of a facility's components located within the restricted area as defined in 10 CFR Part 20. 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 in the *Federal Register* on November 28, 2023 (88 FR 83165), and there has been no public comment on such finding. Accordingly, the amendments meet 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 needs to be prepared in connection with the issuance of the amendments.

6.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: August 14, 2024

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – ISSUANCE OF AMENDMENT NO. 280 TO ADOPT TSTF-258-A, REVISION 4, REGARDING CHANGES TO TECHNICAL SPECIFICATION 5.7, “HIGH RADIATION AREA” (EPID L-2023-LLA-0140) AUGUST 14, 2024

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