

October 10, 2007

Mr. Thomas D. Walt, Vice President  
H. B. Robinson Steam Electric Plant,  
Unit No. 2  
Carolina Power & Light Company  
3581 West Entrance Road  
Hartsville, South Carolina 29550-0790

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – REQUEST FOR  
ADDITIONAL INFORMATION REGARDING PROPOSED TECHNICAL  
SPECIFICATIONS CHANGES FOR CONTROL ROOM HABITABILITY  
(TAC NO. MD6117)

Dear Mr. Walt:

By letter dated July 17, 2007, Carolina Power and Light Company, the licensee for the H.B. Robinson Steam Electric Plant, Unit No. 2 (HBR), now doing business as Progress Energy Carolinas, Inc., submitted an application to amend the facility operating license and technical specifications (TSs) for HBR.

The proposed amendment will revise TS 3.7.9, "Control Room Emergency Filtration System (CREFS)," and add TS 5.5.17, "Control Room Envelope Habitability Program," in accordance with the intent of Technical Specifications Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-448, Revision 3, "Control Room Habitability."

The Nuclear Regulatory Commission staff has determined that it needs additional information in order to complete its review. Please respond to the enclosed questions within 30 days of the date of this letter.

Please contact me at 301-415-3178 if you have any questions on this issue, would like to participate in a conference call, or if you require additional time to submit your responses.

Sincerely,

**/RA/**

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

Docket No. 50-261

Enclosure: As stated

cc: See next page

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\* by memo dated

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**H. B. Robinson Steam Electric Plant,  
Unit No. 2**

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REQUEST FOR ADDITIONAL INFORMATION  
H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
PROPOSED TECHNICAL SPECIFICATION CHANGES  
RELATING TO CONTROL ROOM HABITABILITY  
DOCKET NO. 50-261

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The licensee indicates in their submittal that they are taking exception to portions of Regulatory Guide 1.197 "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors." The specific exceptions are:

- A. "After the second performance of the unfiltered air inleakage testing, subsequent testing will be performed at a frequency based on a plant-specific evaluation."
- B. "Unfiltered air inleakage testing shall include the ability to deviate from the test methodology of ASTM E741. These exceptions shall be documented in the test report."

Title 10 of the *Code of Federal Regulations*. Part 50.36(c)(3), provides for surveillance testing to offer assurance that the necessary quality of systems and components is maintained.

Regulatory Guide 1.197 recommends performing periodic testing of the control room envelope (CRE) on a 6-year schedule to provide assurance of the integrity of the envelope, and to ensure that it is capable of carrying out its function to limit inleakage.

Based on the above discussion, please provide answers to the following two requests:

1. What is the maximum time between CRE integrity inleakage testing that will be permitted based on the two inleakage tests and the plant-specific evaluation you plan to perform?
2. Regulatory Guide 1.197 provides for CRE integrity testing using methods other than ASTM E741. ASTM E741 provides flexibility for the tracer gas testing method. Please indicate what deviations to ASTM E741 are anticipated that are not applicable to the current version of ASTM E741, or the methods covered by Regulatory Guide 1.197.

Enclosure