



Carolina Power & Light Company

August 28, 1979

*Central File*

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USNRC REGION II  
ATLANTA, GEORGIA

FILE: NG-3514(R)

SERIAL: GD-79-2249

Mr. James P. O'Reilly, Director  
United States Nuclear Regulatory Commission  
Region II  
Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
RESPONSE TO IE BULLETIN 79-06C

Dear Mr. O'Reilly:

Attached you will find Carolina Power & Light Company's response to the five short-term and one long-term actions contained in the attachment to your letter of July 26, 1979. Additional information will be submitted in accordance with the schedules set forth in our responses. We trust this information is suitable for your use.

Yours very truly,

B. J. Furr  
Manager  
Generation Department

JJS/jcb

Attachment

cc: Mr. H. R. Denton (NRC)  
Mr. V. Stello (NRC)

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DOCKET NO. 50-261  
RESPONSE TO IE BULLETIN 79-06C

Short-Term Actions

1. Pursuant to the individual requirements of this item the following was initiated on July 27, 1979, the day an advance copy of the Bulletin was telecopied to the plant:
  - a. All operators have been instructed to immediately trip all operating reactor coolant pumps upon reactor trip and initiation of HPI caused by low reactor coolant system pressure.
  - b. Two licensed operators are required to be in the control room at all times during reactor operation to accomplish this action and other follow-up and immediate action required during such an occurrence.

These actions were provided in instructions to the individual shifts from the operating supervisor.

2. A series of Loss of Coolant Accident (LOCA) analyses for a range of break sizes and a range of time lapses between initiation of break and pump trip applicable to the 2, 3 and 4 loop plants has been performed by the Westinghouse Owners' Group. A report summarizing the results of the analysis of delayed Reactor Coolant Pump trip during small loss of coolant accidents for Westinghouse, NSS System will be submitted to Mr. D. F. Ross by Mr. Cordell Reed on August 31, 1979. In the report, maximum PCT's for each break size considered and pump shutoff times have been provided. The report concludes that if the reactor coolant pumps are tripped prior to the reactor coolant system pressure reaching 1250 psia, the resulting peak clad temperatures are less than or equal to those reported in the FSAR. In addition, it is shown that there is a finite range of break sizes and RCP trip times, in all cases 10 minutes or later, which will result in PCT's in excess of 2200°F as calculated with conservative Appendix K models. The operator in any event would have at least 10 minutes to trip the RCP's following a small break LOCA, especially in light of the conservatism in the calculations. This is appropriate for manual rather than automatic action, based on the guidelines for termination of RCP operation presented in WCAP-9600.
3. The Westinghouse Owners' Group has developed guidelines which were submitted to the NRC in Section 6 and Appendix A of WCAP 9600. The analyses provided as the response to item 2 are consistent with the guidelines in WCAP 9600. No changes to these guidelines are needed for both LOCA and non-LOCA transients.
4. The Owners' Group effort to revise emergency procedures covers many issues, including operation of the Reactor Coolant Pumps. The action taken in response to item 1 is sufficient as an interim measure and no immediate need exists for changing our emergency procedures to include the tripping of the Reactor Coolant Pumps. The expected schedule for revising the LOCA, steamline break and steam generator tube rupture emergency procedures is the following:

Mid-October: Guidelines which have been reviewed by the NRC will be provided to each utility. Appropriate utility personnel associated with writing procedures will meet with the Owners' Group Subcommittee on Procedures and Westinghouse to provide the background for revising their emergency procedures.

1 to 2 months  
from Mid-October: Plant specific procedures will be revised.

3 to 4 months  
from Mid-October: Revised procedures will be implemented and operators trained.

5. Analyses related to inadequate core cooling and definition of conditions under which a restart of the RCP's should be attempted will be performed. Resolution of the requirements for the analyses and an acceptable schedule for providing the analyses and guidelines and procedures resulting from the analyses will be arrived at between the Westinghouse Owners' Group and the NRC staff.

#### Long-Term Actions

As discussed in our response to short-term item 2, we do not believe that automatic tripping of the RCP's is a required function based on the analyses that have been performed and the guidelines that have been developed for manual RCP tripping. We propose that this item be discussed with the NRC staff following their review of the Owners' Group Submittal.