

Letter to N. C. Moseley from Carolina Power and Light Company dated July 3, 1975.
This is a supplemental response.

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Reply to IEB - 75-04A



Carolina Power & Light Company

July 3, 1975

File: NG-3513 (R)

Serial: NG-75-1034

Mr. Norman C. Moseley, Director
U. S. Nuclear Regulatory Commission
Region II - Suite 818
230 Peachtree Street, N.W.
Atlanta, Georgia 30303

Dear Mr. Moseley:

H. B. ROBINSON UNIT NO. 2
LICENSE NO. DPR-23
IE BULLETIN NUMBERS 75-04 AND 75-04A
CABLE FIRE AT BROWNS FERRY NUCLEAR STATION

In compliance with the commitment of our April 24, 1975 letter to provide monthly progress reports on our response to IE Bulletin Nos. 75-04 and 75-04A, the following report for June is submitted.

Bulletin No. 75-04

The Architect-Engineer of the plant, Ebasco Services, has indicated that the study they are presently performing concerning the locations of and specifications for electrical cable and cable tray penetrations at H. B. Robinson is nearing completion. We expect to receive the report on this study by July 11, 1975. Utilizing this report, we intend to ensure that all designated fire barriers are present and intact. Discrepancies located will be corrected to ensure equivalence with the original specifications. Correction of any discrepancies noted will be effected in a timely manner, in keeping with the availability of materials required to implement the corrections.

Bulletin No. 75-04A

A plant staff policy review meeting concerning the requests of IE Bulletin 75-04A has been held at H. B. Robinson Plant. The conclusions of this meeting are hereby forwarded for your consideration.

Response to Item 2:

As requested, policies and procedures concerning construction, maintenance and modification activities, which may affect the safety of a unit in operation, have been reviewed. Since Robinson 2 is an operational plant, any work of a "construction" nature is performed as a plant modification. We, therefore, have not addressed construction in our review.

Maintenance is controlled by the Nuclear Plant Equipment Trouble and Work Report (Trouble Ticket). Maintenance items may be identified on this report by any employee. The report is then forwarded to the Shift Foreman who specifies the urgency with which the repair must be made. The Shift Foreman at this time determines whether the maintenance item should be performed with the plant on the line or should be deferred until a plant shutdown. Plant modifications are controlled by the Modification Procedure. The modification package specifies plant conditions necessary for accomplishment and is reviewed by the Plant Nuclear Safety Committee. These procedures adequately address the maintenance and modifications which might affect the safety of a unit in operation.

Response to Item 3:

Policies and procedures concerning work which is performed during plant operation were considered as indicated below:

- a. We concluded from our review that our Trouble Ticket and Modification Procedures do not adequately address the degree of safety significance of affected and nearby cabling and piping. We, therefore, intend to add a statement to the instructions for trouble ticket preparation to ensure that the Shift Foreman does consider nearby cabling and piping when assigning trouble ticket priorities. We will also add a statement to our Modification Procedure to ensure that when the plant conditions are designated, consideration is given to the safety significance of nearby cabling and piping.
- b. We are currently preparing a procedure, based on National Fire Protection Association Standards, for handling combustible liquids and gases. This procedure and our Cutting, Welding and Hot Work Permit will adequately control combustible materials.
- c. Equipment which could provide an ignition source is utilized under the control of our Cutting, Welding and Hot Work Permit Procedure, which assures adequate measures are provided regarding ignition sources.
- d. Plant monitoring is performed by various individuals all of whom are a part of the plant fire brigade and are subject to the Station Fire Bill as indicated below:
 1. Vital areas, including the reactor auxiliary building, are patrolled by the plant security force. One of the designated duties of the security force is to provide fire protection surveillance.
 2. In the course of their duties, auxiliary operators are required to periodically tour the plant during their eight-hour shift.
 3. Normally when work is performed in a High Radiation Area, Health Physics personnel provide coverage of the job.
 4. Normally, when maintenance or modification work is performed, at least two mechanics or technicians are assigned to a job, facilitating overall coverage of the area.

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5. Fire or smoke detection systems, which give indication in the control room, are installed at various areas in the plant. These systems provide continuous surveillance.

We feel, therefore, that plant surveillance is adequate as presently performed.

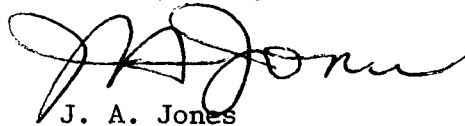
- e. The plant public address system as currently installed provides all plant personnel with prompt communications with the operating personnel in the control room.
- f. Adequate fire suppression equipment is available throughout the plant. In areas where hot work is being performed, the availability of sprinklers or extinguishers and a fire watch is required by the Cutting, Welding and Hot Work Permit System. All portable fire extinguishers, hose stations, hose houses, fire system valves, fire pumps and fire pump power supplies are checked monthly per a periodic test. Any discrepancies noted are repaired.
- g. We are still investigating the safety-related aspects of fighting a Class C (electrical) fire. We are considering fire-fighting tactics and equipment available for this service. Our conclusions including new equipment required, if any, will be presented in our July report.

Response to Item 4:

We are continuing our review of emergency procedures, and will address this item in our July report. No need for revision or additional procedures has yet been identified.

We will have all reviews completed by July 31, 1975. We intend to implement any plant repairs as promptly as possible contingent upon material and services availability.

Yours very truly,



J. A. Jones
Executive Vice-President
Engineering, Construction & Operation

DBW:jwk

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