

DISTRIBUTION:
 AEC PDR
 Local PDR
 Docket
 ORB#3 Rdg
 JRBuchanan
 TBAbernathy
 ACRS (16)
 RO (3)
 OGC
 SATEets
 GOWsley
 Glear
 KRGoller
 AGiambusso
 EGCase
 SVarga
 CMilas-2

AUG 5 1974

Docket No. 50-261

Carolina Power & Light Company
 ATTN: Mr. E. E. Utley, Vice President
 Bulk Power Supply Department
 336 Fayetteville Street
 Raleigh, North Carolina 27602

Gentlemen:

The Director of Regulation has determined that good cause has been shown in your request of June 19, 1974, and has extended the time to October 5, 1974, for submission of the required ECCS evaluation for the H. B. Robinson Unit No. 2. The basis for the extension is contained in the enclosed Determination, a copy of which is being filed with the Office of the Federal Register for publication.

Sincerely,

Original Signed By
 K. R. Goller

Karl R. Goller, Assistant Director
 for Operating Reactors
 Directorate of Licensing

Enclosure:
 Determination

cc: w/enclosure
 See next page

SEE PREVIOUS YELLOW FOR CONCURRENCE CHAIN

OFFICE	ORB#3 Rdg	ORB#3	OGC	L:OR	L:RP	L:AD
SURNAME	for SATEets: kdm	GOWsley	Glear	KRGoller	AGiambusso	EGCase
DATE	for 8/5/74			8/5/74		

Carolina Power & Light Company

cc w/enclosure

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
910 - 17th Street, N. W.
Washington, D. C. 20006

John D. Whisenhunt, Esquire
Bridges and Whisenhunt
Bridges Building
Post Office Box 26
Florence, South Carolina 29501

Mr. Elmer Whitten
State Clearinghouse
Office of the Governor
Division of Administration
1205 Pendleton Street
4th Floor
Columbia, South Carolina 29201

Mr. Harrell L. Gordner
Chairman, Darlington County
Board of Commissioners
Route 2
Darlington, South Carolina

Hartsville Memorial Library
Home and Fifth Avenues
Hartsville, South Carolina 29550

OFFICE >						
SURNAME >						
DATE >						

Docket No. 50-261

Carolina Power & Light Company
ATTN: Mr. E. E. Utley, Vice President
Bulk Power Supply Department
336 Fayetteville Street
Raleigh, North Carolina 27602

Gentlemen:

The Director of Regulation has determined that good cause has been shown in your request of June 19, 1974, and has extended the time to October 5, 1974, for submission of the required ECCS evaluation for the H. B. Robinson Unit No. 2. The basis for the

extension is contained in the enclosed Determination, *a copy of which is being sent to the office of the Federal Register for publication.*
Sincerely,

Karl R. Goller, Assistant Director
for Operating Reactors
Directorate of Licensing

Enclosure:
Determination

cc: w/enclosure
See next page

check this →

OFFICE	ORB#3	ORB#3	OGC	L:OR	L:RP	L:AD
SURNAME	Subjects:kmf Gowley	Glear	Fred Grey	KRGoller	AGiambusso	EGCase
DATE	8/01/74	8/1/74	8/5/74	/ /74	/ /74	/ /74

UNITED STATES ATOMIC ENERGY COMMISSION

DOCKET NO. 50-261

CAROLINA POWER AND LIGHT COMPANY

DETERMINATION OF REQUEST FOR EXTENSION OF TIME
FOR SUBMITTAL OF EVALUATIONS REQUIRED BY ACCEPTANCE
CRITERIA FOR EMERGENCY CORE COOLING SYSTEMS (10 CFR
§ 50.46(a)(2)(iii))

As required by 10 CFR § 50.46(a)(2), certain licensees must achieve compliance with acceptance criteria for emergency core cooling systems (ECCS) published in Appendix K to 10 CFR Part 50, by August 5, 1974, unless an extension of time for submission of the required ECCS performance evaluation and proposed Technical Specifications has been approved by the Director of Regulation pursuant to 10 CFR § 50.46(a)(2)(iii). As required by 10 CFR § 50.46(a)(2)(iii), a Notice was published in the Federal Register on July 11, 1974 (39 FR 25527), that the Director of Regulation had received and was considering a request from the Carolina Power and Light Company (the licensee) for an extension of time until October 5, 1974, of the submittal date for the H. B. Robinson Unit No. 2 Nuclear Power Plant (Robinson 2) ECCS evaluation.

The Notice also invited the submission of views and comments by any interested persons on the licensee's request. Comments have been received from Friends of the Earth and Consolidated National Intervenors. These groups oppose the granting of the requested extension of time on the grounds that the licensee's application does not present evidence to support the requested extension and that the licensee should be required to submit a schedule of its review process and the times required for each task. In addition they note that the request does not present any evidence to show that the delay by the

licensee's original architect-engineering firm, Ebasco, is supported by good cause and whether this delay need affect the vendor's review.

The Regulatory staff has taken into account these comments in the determination reflected herein. After comparing the licensee's requested extension to the minimum time the Regulatory staff believes is required by a utility to review the vendor's evaluation model and analyses, the Regulatory staff believes the licensee has shown good cause for an extension of time.

In support of its request for an extension of time, Carolina Power and Light Company states in its request that the architect-engineering firm, Ebasco, will be several weeks late in providing input information for the reactor vendor to use in its evaluation model. Therefore, the results of the evaluation from the reactor vendor will be delayed beyond the original mid-July schedule and upon receipt of the completed ECCS evaluation, Carolina Power and Light Company states it must review and prepare proposed Technical Specifications. (Westinghouse (W) has indicated the evaluation model and analyses would be submitted to the licensee on August 30, 1974.)

It is evident from the licensee's request that the basis for an extension of time is the unavailability of the necessary evaluation models and analyses from W, which in turn, was delayed waiting for input to the calculations from Ebasco. Since the promulgation of the regulation, the Regulatory staff has been engaged in a continuing effort to develop an AEC evaluation model which would

meet the requirements of Appendix K of 10 CFR Part 50. A similar effort has been underway by the four vendors of nuclear steam supply systems for light-water nuclear power reactors, including W. As the Regulatory staff recognizes from its efforts, this development work has involved a considerable amount of time. Based upon the Regulatory staff's experience and its knowledge of the efforts on the part of W to develop adequate evaluation models and analyses, the Regulatory staff believes that the licensee's statements regarding delay of Ebasco and by W in completing and submitting to it an evaluation model and analyses constitutes good cause for an extension of the August 5, 1974 deadline for the submittal of the information required by 10 CFR § 50.46. The Regulatory staff believes the licensee has justified an extension of time until October 5, 1974 as requested. The Regulatory staff has independently developed a schedule of the steps and average times that should be sufficient for internal review by the licensee after transmittal by W of the W evaluation and analyses to the licensee.

This schedule takes into account the review schedules submitted by all licensees who have requested extensions as well as the Regulatory staff's own views as to the minimum time which should be required for the licensees to conduct the necessary reviews and to prepare the necessary information for submittal to the Regulatory staff. The Regulatory staff's schedule is as follows:

1. Engineering review (including Q/A review) of evaluation models and analyses. (7 days)

MEMO ROUTE SLIP

Form AEC-93, (Rev. May 14, 1947) AECM 0240

See me about this.

For concu.

For action.

Note and return.

For signature.

For information.

TO (Name and unit)

INITIALS

REMARKS

DATE

TO (Name and unit)

INITIALS

REMARKS

DATE

TO (Name and unit)

INITIALS

REMARKS

DATE

FROM (Name and unit)

REMARKS

PHONE NO.

DATE

USE OTHER SIDE FOR ADDITIONAL REMARKS

GPO : 1971 O - 445-469

2. Preparation of proposed Technical Specifications and revised operating procedures. (14 days)
3. Review by plant operations and nuclear safety committee and appropriate company nuclear review committee. (10 days)
4. Submit (4 days)

Total Time: 35 days

Based upon the above, the Regulatory staff has concluded that an extension of time of 35 days should be granted to the licensee commencing with the date of transmittal by W of the W model and analyses to the licensee. It should be noted that this licensee will be required to operate the Robinson 2 reactor in accordance with limitations of the Interim Acceptance Criteria for ECCS during the period of the time extension granted herein.

Accordingly, based on the foregoing considerations and for good cause shown, the Director of Regulation hereby grants an extension of time to the licensee which extends the date for compliance with the requirements of 10 CFR § 50.46(a)(2)(ii) from August 5, 1974 until October 5, 1974.

Dated at Bethesda, Maryland, this *5th* day of *August* 1974.

FOR THE ATOMIC ENERGY COMMISSION

Original Signed By
E. G. Case

Edson G. Case
Acting Director of Licensing

see change on p. 2

EG Case signed original on 8/2/74

OFFICE ▶	ORB #1:L <i>EG Case</i>	ORB #3:L <i>Glear</i>	OGC <i>ABG</i>	ADOR:L <i>KRG</i>	DDRP:L <i>CJ</i>	L <i>EG Case</i>
SURNAME ▶	<i>R. S. P. 15</i>	<i>Glear</i>	<i>ABG</i>	<i>KRGoller</i>	<i>AGIambusso</i>	<i>EG Case</i>
DATE ▶	<i>8/1/74</i>	<i>8/1/74</i>	<i>8/2/74</i>	<i>12/74</i>	<i>8/2/74</i>	<i>/ /74</i>

licensee's original architect-engineering firm, Ebasco, is supported by good cause and whether this delay need affect the vendor's review.

The Regulatory staff has taken into account these comments in the determination reflected herein. After comparing the licensee's requested extension to the minimum time the Regulatory staff believes is required by a utility to review the vendor's evaluation model and analyses, the Regulatory staff believes the licensee has shown good cause for an extension of time.

[It should be noted that in making its determination, the Regulatory staff considered the licensee's claim that additional time was needed for the Architect-Engineer's evaluation.]

In support of its request for an extension of time, Carolina Power and Light Company states in its request that the architect engineering firm, Ebasco, will be several weeks late in providing input information for the reactor vendor to use in its evaluation model. Therefore, the results of the evaluation from the reactor vendor will be delayed beyond the original mid-July schedule and upon receipt of the completed ECCS evaluation, Carolina Power and Light Company states it must review and prepare proposed Technical Specifications. (Westinghouse (W) has indicated the evaluation model and analyses would be submitted to the licensee on August 30, 1974.)

It is evident from the licensee's request that the basis for an extension of time is the unavailability of the necessary evaluation models and analyses from W, which in turn, was delayed waiting for input to the calculations from Ebasco. Since the promulgation of the regulation, the Regulatory staff has been engaged in a continuing effort to develop an AEC evaluation model which would

OFFICE ▶

SURNAME ▶

DATE ▶