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RECIP.NAME RECIPIENT AFFILIATION
VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Submits schedule for refueling facility for Cycle 8 operation.ECCS analysis being reperformed to allow for up to 10% steam generator tube plugging in event steam generator insp program indicates addl tubes need to be plugged.

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CP&L
Carolina Power & Light Company

July 22, 1980

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Office of Nuclear Reactor Regulation
ATTENTION: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
United States Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
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CYCLE 8 OPERATION

Dear Mr. Varga:

This letter is to inform the Commission of Carolina Power & Light Company's (CP&L) schedule for refueling H. B. Robinson Unit 2 for its Cycle 8 operation. At the present time, our system planning calls for completion of Cycle 7 operation on or about August 1, 1980. At that time, we will begin our refueling outage which is scheduled for approximately six weeks.

Refueling for Cycle 8 will be performed in accordance with the authorization of 10CFR50.59(a), since Cycle 8 core operation will involve no unreviewed safety questions and will require no change in the technical specifications of the plant.

Carolina Power & Light Company is reperforming our ECCS analysis to allow for up to ten percent (10%) steam generator tube plugging in the event our steam generator inspection program during the outage indicates additional tubes need to be plugged. Our current ECCS analysis was performed assuming six percent (6%) of the steam generator tubes were plugged. The reanalysis is being performed in accordance with Exxon Nuclear Company's WREM-IIA ECCS evaluation model identified in XN-NF-78-30, which has already received NRC approval. This reanalysis is not expected to result in any technical specification changes. However, if review of the analysis determines that an unreviewed safety question is involved, or that a technical specification change is necessary, the appropriate material will be submitted to the NRC. Otherwise, the results will be documented in accordance with 10CFR50.71.

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411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Carolina Power & Light Company is planning to irradiate one Exxon nuclear fuel assembly for its 5th operating cycle in the H. B. Robinson Cycle 8 core. This irradiation is to provide a small scale demonstration of fuel performance at exposure greater than 40,000 MWD/MTU. The average exposure of this assembly will be about 40,000 MWD/MTU at the start of Cycle 8 and about 48,000 MWD/MTU at the end of the cycle.

The assembly to be used will be chosen from the four assemblies currently being irradiated for the 4th irradiation cycle in H. B. Robinson. These four assemblies will be examined following the current reactor Cycle 7 to confirm that the condition of the fuel provides adequate assurance that it will perform satisfactorily for a 5th cycle.

Our confidence that this fuel assembly will operate successfully for the full cycle is based on the previous performance of Exxon nuclear fuel, the favorable poolside inspection results of the fuel after three cycles of operation, and the fact that the assembly power will be about 80 percent (80%) of the average assembly power in the reactor core. Clad strain at the end of Cycle 8 should be less than one percent (1%) based on calculations and measurements of a representative number of fuel rods at the end of the third cycle of irradiation. Fuel inspections scheduled at the end of Cycle 7 will be used to confirm the amount of clad strain during the fourth cycle of operation. The internal fuel rod pressure is expected to be less than the external pressure during normal operation because of the anticipated low fission gas release during the low temperature operation of this fuel in both the 7th and 8th plant operating cycles.

Carolina Power & Light Company has not yet completed its safety review of Cycle 8 with the extended high burnup demonstration; however, our preliminary assessment is that no technical specification change is needed and that it does not constitute an unreviewed safety question.

If further evaluation and the formal review of this demonstration by the plant PNSC do not confirm our preliminary assessment, the demonstration bundle will not be utilized in Cycle 8.

If you have any questions concerning these matters, please contact our staff.

Yours very truly,

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

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