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SCHWENCER, A. ***OPERATING REACTORS BRANCH 1

DOCKET #
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SUBJECT: Provides info re continued containment purging during normal plant operation requested in 781128 ltr. Actions taken: plans for unlimited purging initiated & containment purge capability used to reduce high ambient temps.

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capability would undoubtedly increase the occupational exposure at Robinson and be inconsistent with the ALARA Program.

- b. During hot summer months, ambient temperatures within the containment vessel approach 120°F. Under this condition, the containment vessel becomes habitable for only short periods of time. It is not unlikely that extended maintenance efforts would be required during this period. In order to reduce the potential for heat prostration, a significant occupational hazard under these conditions, the containment purge capability is utilized to reduce the high ambient temperatures. This permits the necessary completion of extended maintenance/inspection of equipment, some of which is vital to reactor protection and safeguards.

The containment purge valves are redundant 42-inch spring-loaded, fail-close butterfly valves which are designed to close within two seconds under accident conditions. Because of their design specifications, as verified by the architect/engineer, Carolina Power & Light Company has confirmed that they will function as intended during a design basis loss-of-coolant accident. Due to the current unknowns regarding the depth with which the additional requested analyses will have to be performed, Carolina Power & Light Company does not believe the evaluations will be available for review before May 1, 1979. Notification of any improvement of this schedule will be provided should it occur.

2. A review of the plant safety actuation signal circuits was completed and the only blocks or overrides that exist in these circuits at H. B. Robinson are the two operator actuated safety injection block switches on the control board required for normal Plant shutdowns. One switch blocks low pressurizer pressure signals and high steam line delta pressure signals and can be actuated by the operator below 200 psi pressurizer pressure. It will annunciate when blocked and will automatically unblock when the pressurizer pressure exceeds 2000 psi.

The second switch blocks the low Tavg signal and can be manually blocked when Tavg is below 543 degrees. It also alarms when blocked and will automatically be unblocked when Tave exceeds 543 degrees. Our review has confirmed

that these blocks perform only their design function and have no unanticipated effects. We feel their proper use is adequately administered by the Plant Operating Manual, GP-1, and no further action is required on this item.

It is the opinion of Carolina Power & Light Company that the concerns related and actions required by the referenced letter represent an overreaction to the situation that occurred at the facilities in question. Although the required action may significantly affect the ability to continue to maintain strict ALARA philosophies and other occupational considerations regarding maintenance and inspection in the containment vessel, Carolina Power & Light Company will agree to limit purging during operating conditions to 90 hours per year while the required reviews are in progress.

Yours very truly,



E. E. Utley
Senior Vice President
Power Supply Group

CSB/jnh*