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RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. OPERATING REACTORS BRANCH 1

SUBJECT: SEVERAL FIRE POTECTION MODS REQUIRED TO BE COMPLETED BY END OF 1979 REFUELING OUTAGE WILL BE DELAYED.UTIL INTENDS TO MAKE DECISION RE FIRE SUPPRESSION OR OIL COLLECTION SYS BY 790701.

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Carolina Power & Light Company

April 27, 1979

FILE: NG-3514(R) SERIAL: GD-79-1135

Office of Nuclear Reactor Regulation
ATTENTION: Mr. Albert Schwencer, 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
LICENSE NO. DPR-23
FIRE PROTECTION MODIFICATIONS

Dear Mr. Schwencer:

Several of the fire protection modifications required to be completed by the end of the 1979 refueling outage in Table 3.1 of the Safety Evaluation Report of February 28, 1978, will not be completed by the end of the outage. A discussion of each of these modifications follows, in which the reason for not completing the modification, the intended action to be taken to ensure an equivalent measure of mitigation or prevention of a fire in the area, other modifications which have been performed which improve fire response for the area, and an expected completion date for the modification are stated.

1. SER Item 3.1.23 - Battery Room Ventilation Modifications

As a result of the review of the battery room ventilation system considering installation of a fire door between the battery room and the emergency switchgear room and isolation fire dampers in the existing ventilation ductwork, installation of a system was designed that would cycle outside air through the battery room independently and, thus, provide the desired cooling of the room and ventilation to assure hydrogen gas control. During the procurement phase of the project, it was found that the required safety related fan motors could not be provided by the vendor on a schedule consistent with completion of the modification. Until the fan units are delivered and installed, Carolina Power & Light Company intends to employ the existing 2000 CFM battery room fan on an interim basis. Inlet air will be provided by the new eight-inch air inlet openings in the outer wall of the battery room near the floor.

Review of room air temperatures under worst conditions and hydrogen gas concentrations has assured that these remain well within acceptable limits. The present fan has an air flow switch installed to indicate fan or air flow failure, ensuring operator notification if ventilation flow is lost.

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Other modifications such as fire doors, fire dampers, and detectors will be complete, so that Carolina Power & Light Company believes that an equivalent measure of protection for the battery room will exist in the interim. As a result, Carolina Power & Light Company requests an extension of the completion date of the modification to October 31, 1979, to allow for delivery and installation of the new fan units.

2. SER Item 3.1.21 - Reactor Coolant Pump Oil Spill Collection

In our letter of June 23, 1977, Carolina Power & Light Company committed to the installation of a system to contain and collect oil leaking from various portions of the reactor coolant pump motors inside containment. As preliminary designs proceeded to be finalized and equipment specified for the various oil shields and collector pans, Carolina Power & Light Company began to question not only the impact of the collection system on operability and maintainability of the reactor coolant pumps and motors, but also the suitability of the system to ensure on a long-term basis that all oil spillage or leaks would be adequately contained. These problems were not foreseen until late 1978 and early 1979, and could not be resolved satisfactorily such that procurement and installation of the modifications during the 1979 refueling outage could be guaranteed.

In addition, discussions with the NRC staff concerning the desirability of installing hose stations and standpipes inside containment have led us to investigate the possibility of installing suppression systems inside the pump bays similar to those approved for other licensees to ensure prompt and effective control of any fires which could occur.

Delay of the installation of the oil collection system will not provide the total protection capability desired for these areas by the end of the 1979 refueling outage. However, the detection system for the pump bays and the containment air recirculation units will be installed, ensuring prompt detection in the event of a fire. Other submittals by CP&L have discussed the means of fire fighting which now exist or can be made available for the containment area once a fire is detected. We believe that, considering the relatively low probability of a fire in this area combined with the fact that a postulated fire will not damage systems or components required for safe shutdown of the plant, plant operation in the interim until a final modification is installed can be safely continued.

Carolina Power & Light Company intends to make its decision on which system (fire suppression or oil collection) should be employed for this area by July 1, 1979, and will inform the staff of its decision. In any event, Carolina Power & Light Company will install the system by the end of the 1980 refueling outage, which is expected to occur prior to October 31, 1980.

If you have any questions regarding these items, please contact our staff.

Yours very truly,

E. E. Utley
Senior Vice President
Power Supply

JJS/mf