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RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Operating Reactors Branch 1

SUBJECT: Forwards response to NRC 800207 questions re fire protection. Addl responses will be submitted no later than 800601. Mods necessary to provide adequate fire protection will be completed by 801031.

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CP&L
Carolina Power & Light Company

April 1, 1980

File: NG-3514(R) Serial No.: NO-80-483

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 PROGRAM - DEDICATED SHUTDOWN SYSTEM

Dear Mr. Schwencer:

Attached is Carolina Power & Light Company's (CP&L's) response to part of the NRC staff's questions telecopied February 7, 1980, concerning fire protection at H. B. Robinson Unit No. 2. Question numbers S1, S2, S3, S4, S5, S6, and S10 are responded to in this submittal. Answers to the remaining questions, S7, S8, S9, S11, and S12, are being developed in conjunction with our consultant and will be submitted by separate correspondence no later than June 1, 1980.

As we have stated previously in other correspondence, CP&L intends to provide adequate fire protection features at H. B. Robinson and is actively working to complete modifications discussed in the attached enclosures. Every effort is being made to complete these modifications by October 31, 1980. However, due to equipment lead times, the modifications could be delayed past this date. If any problems do occur, the Staff will be notified on a case-by-case basis. If you have additional questions or concerns about the subjects addressed herein, you are requested to forward them promptly so as not to jeopardize the present schedule.

We trust that this information is suitable for your use.

Yours very truly,

Ma M. Duffie

for E. E. Utley
Executive Vice President
Power Supply and Customer Services

WER/CSB/JJS/jc (0557)
Attachment
cc: Mr. J. D. Neighbors (NRC)

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

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ATTACHMENT

S1. The staff's review of your submittals of June 23, 1977, and February 1, 1980, indicates that your design does not satisfy the staff's position on safe shutdown. Therefore, please justify not providing the following instrumentation:

(a) Primary System Hot and Cold Leg Temperatures

(b) Condensate Storage Tank Level

(c) Auxiliary Feedwater Flow Rate

Response

(a) Primary system hot and cold leg temperature indication was inadvertantly omitted. This indication will be provided on the primary control panel. Every effort will be made to have the indication installed by October 31, 1980.

(b) Condensate storage tank level indication was inadvertantly omitted. This indication will be provided on the secondary control panel. Every effort will be made to have the indication installed by October 31, 1980.

(c) CP&L does not feel that auxiliary feedwater flowrate indication is necessary for the reliable operation of the dedicated shutdown system. This position is justified by the following:

(1) The steam generator level indication presently provided will give a reliable indication as to whether or not there is adequate feedwater flow to the steam generators.

(2) The condensate storage tank level indication which is being installed will also provide indication of auxiliary feedwater flow.

(3) With the combination of steam generator level and condensate storage tank level, the operator has adequate knowledge of auxiliary feedwater flow to operate the plant.

(4) Providing this indication additionally complicates the control panel with little, if any, additional benefits.

Therefore, CP&L does not intend to install an indication for auxiliary feedwater flow.

S2. Clarify the discrepancy between the first full paragraph of the third page of your response to question 18-1 (June 23, 1977) and the FSAR Figures 6.2.1 and 10.2-2 that show check valves between the pressure gauges and the processes that the gauges are supposed to monitor. Your response should specifically

discuss how the gauges satisfy IEEE Std. 279-1971, Paragraph 4.8 when the subject pumps are not operating.

Response

The first full paragraph of the third page of CP&L's reponse to question 18-1 (June 23, 1977) indicating that no pressure channels would be provided is in error. Pressurizer pressure indication has been provided on the primary control panel.

S3. Clarify the discrepancy between your submittals of June 23, 1977, and February 1, 1980, with regard to the need for Boric Acid Transfer Pump A in the safe shutdown design.

Response

As discussed with NRC staff by telephone, the boric acid transfer pump is not required for safe shutdown and is not a part of the Dedicated Shutdown System.

S4. Describe the indication that is provided to the operator in the control room if either the service water or boric acid pump transfer switch is in the alternate position.

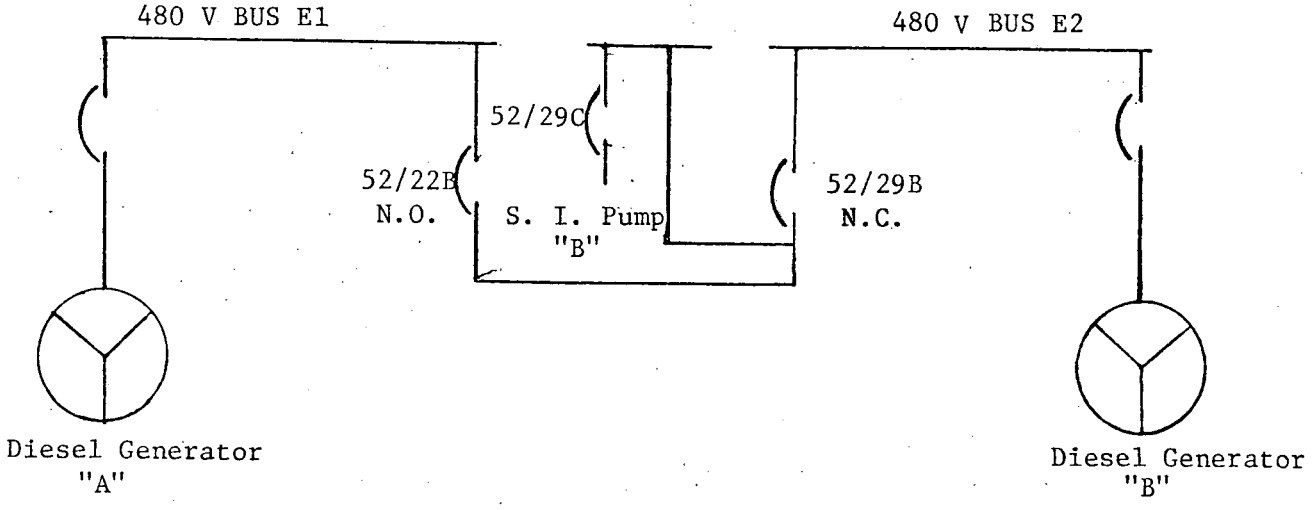
Response

If the transfer switch for service water pump "D" is placed in the "local control" position, then a service water pump "D" in "local control" alarm annunciates in the control room. The boric acid pump is not used as a part of the dedicated shutdown system.

S5. Clarify the discrepancy between the first and fourth paragraphs of FSAR page 8.2-13 with regard to the transfer of loads from one diesel generator to the other.

Response

The following is a one-line diagram of the E1-E2 cross tie as mentioned on page 8.2-13 of the FSAR.



Breakers 52/22B and 52/29B have automatic interlocks which prevent both breakers from being closed at the same time. The first paragraph on page 8.2-13 of the FSAR refers to the case where one of the emergency diesel generators does not start and come on line as required. The automatic interlock could be manually defeated so that both tie breakers could be manually closed at the same time, thus feeding both E1 and E2 from one diesel generator.

The fourth paragraph on page 8.2-13 of the FSAR refers to assuring a power supply to Safety Injection (S.I.) Pump "B". Normally S.I. Pump "B" is fed from 480 V. Bus E2. If there was a loss of off-site power concurrent with a safety injection actuation and diesel generator "B" did not start up, breaker 52/29B would automatically close thus ensuring a power supply to S. I. Pump "B" from 480 V. Bus E1 and 480 V. Bus E2 are not tied together in this case.

S6. The response to Question 8a states, in part, that breakers will be manually operated in the event of a complete loss of site dc. The response to Question 8h indicates that only two operators will be available to operate Units 1 and 2 in the event of a fire in Unit 2 with at least six persons for fire brigade functions. Provide a description of your basis for assuring that sufficient time will be available for one man to charge the springs in the required breakers in the time that is required to assure safe shutdown.

Response

A redundant source of DC power for the breakers to be operated from the safe shutdown panel has been provided, thus removing the requirement for manual breaker operation in the event of a failure of the normal plant DC power sources.

S10. With regard to the response to Question 8h, explain why abandonment of the fossil unit during a fire in Unit 2 does not constitute an additional hazard to Unit 2.

Response

Should the Unit 1 operator find it necessary to evacuate the control room due to a fire, his first action would be to trip Unit 1. Unit 1 may also be tripped locally at the turbine control panel. It is highly impropable that any malfunction of Unit 1 could affect the safe operation or the ability to safely shutdown Unit 2.