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SUBJECT: Responds to 820721 ltr requesting clarification of auxiliary
 feedwater sys boundaries assumed in 811231 response to
 Generic Ltr 81-14. Analyses done for IE Bulletin 79-14
 adequate for use in response to generic ltr.

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Carolina Power & Light Company

AUG 20 1982

Office of Nuclear Reactor Regulation
ATTN: 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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SEISMIC QUALIFICATION OF AUXILIARY FEEDWATER SYSTEMS

Dear Mr. Varga:

This letter is in response to your letter of July 21, 1982 in which you requested a clarification of the Auxiliary Feedwater System (AFWS) boundaries assumed in our response to Generic Letter 81-14 dated December 31, 1981. Each of your questions is listed, followed by our response.

Question 1: Enclosure 1 of Generic Letter 81-14 (GL 81-14) defines the auxiliary feedwater (AFW) system to be considered as:

- (a) "The AFW system boundary from suction to discharge (including the water source to heat sink) shall include those portions of the system required to accomplish the AFW system function and connected branch piping up to and including the second valve which is normally closed or capable of automatic closure when the safety function is required."
- (b) "The AFW system boundary shall also include any portion of branch piping that is structurally coupled to the AFW system boundary such that the seismic response of the branch piping transmits loads to the AFW system. As a minimum, this includes the branch lines outside the AFW system boundary to a point of three orthogonal restraints."

Response: The AFWS was analyzed in accordance with IE Bulletin 79-14. This analysis consisted of a reverification of the original plant seismic analysis and designs. During the original plant analyses there were no guidelines on how to model branch line connections to the systems being analyzed. This was due to a restriction in the number of node points that could be modeled in one computer run utilizing the codes in existence at the time of the original analysis. Therefore, during the IE Bulletin 79-14 analyses, the additional effects of branch line loading was reviewed by the stress analyst on a case by case basis.

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Specifically, in the case of the AFWS, branch line loading was judged not to be significant, therefore, was not factored into the analysis.

Question 1(c). "All mechanical and electrical equipment, piping (e.g. instrument air), conduits and cable trays, which are necessary or contain items which are necessary for the operation of the AFW system, shall also be considered."

Response: As stated in our original response of December 31, 1981, CP&L is currently evaluating the adequacy of anchorage and support of safety related electrical equipment as described in IE Information Notice 80-21. As part of this analysis, the adequacy of the seismic qualification of electrical cables and motor control centers will be assessed. The work is scheduled to be completed by the end of 1982.

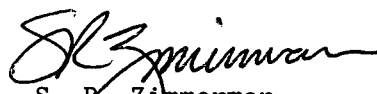
Question 1(d). "In addition, the structures housing these systems and components shall be included."

Response: As described in FSAR Section 5, the structures which house the AFW system components (containment, auxiliary building, turbine building around the AFW equipment, and control room) are all seismic Class I.

Carolina Power & Light Company considers the analyses done for IE Bulletin 79-14 to be adequate for use in response to Generic Letter 81-14. We also expect that the current work in IE Notice 80-21 will demonstrate the acceptability of the AFW electrical components.

If you have any questions, please contact my staff.

Yours very truly,



S. R. Zimmerman
Manager

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DCW/lr (3042C4T3)

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)