

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8212060069 DOC.DATE: 82/11/29 NOTARIZED: NO DOCKET #
 FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261
 AUTH.NAME AUTHOR AFFILIATION
 EURY,L.W. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 82-22 re steam generator tube maint.
 Plant has experienced occasional minor tube leakage over
 last 4 yrs.Replacement steam generators have been ordered &
 replacement will start in late 1983.

DISTRIBUTION CODE: A001S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 2
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL
	NRR ORB1 BC 01		7 7				
INTERNAL:	ELD/HDS1		1 0		NRR/DL DIR		1 1
	NRR/DL/ORAB		1 0		NRR/DSI/RAB		1 1
	<u>REG FILE</u> 04		1 1		RGN2		1 1
EXTERNAL:	ACRS 09		6 6		LPDR 03		1 1
	NRC PDR 02		1 1		NSIC 05		1 1
	NTIS		1 1				



Carolina Power & Light Company

November 29, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
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
CONGRESSIONAL REQUEST FOR INFORMATION CONCERNING
STEAM GENERATOR TUBE MAINTENANCE

Dear Mr. Eisenhut:

Generic Letter No. 82-22 dated October 26, 1982 requested information regarding steam generator tube maintenance. Carolina Power & Light Company (CP&L) has conducted maintenance on the Robinson Unit 2 steam generators using effective procedures to ensure proper control of radiation exposure to workers. In addition, our Corporate ALARA Program has continued to assess methods of restricting and reducing radiation exposure to workers during these steam generator maintenance activities. Since initial operation of the H. B. Robinson Unit 2 in 1971, the steam generators have performed well with minimal leaks and it has been only recently that we have experienced corrosion of steam generator tubes to a sufficient extent to require long term corrective action.

During plant operation over the past four years, the plant has experienced occasional minor steam generator tube leakage which approached stringent technical specification limits, at which time we have shut down the plant to perform steam generator maintenance activities. These outages have averaged only three weeks per year over the past four years. During these maintenance periods CP&L has made entries in the primary side of the steam generators to conduct eddy current testing of the steam generator tubes and plugging of those tubes which are approaching a corrosion limit that could cause future operational problems. Carolina Power & Light Company has not conducted any tube sleeving operations. Full power operations have not been restricted as a result of steam generator tube maintenance since total plugging of steam generator tubes has been limited to thirteen percent of available steam generator tubes.

Most recently industry experience indicates that steam generator tube corrosion can be controlled by operating at a lower primary temperature; thus, we have restricted our operations to a lower primary temperature in

8212060069 821129
PDR ADOCK 05000261
PDR

Adol

order to further limit tube corrosion and maintenance activities and limit further occupation radiation exposure. Through these operational practices and stringent maintenance procedures which adhere to Corporate ALARA Policy, CP&L has been successful in limiting occupational radiation exposure due to steam generator maintenance to an average of only 215 person-rem per year over the last four years. This means that an average of 22 percent of the total annual employee dose has been attributable to steam generator tube maintenance.

Carolina Power & Light Company requires all temporary workers to present a NRC Form 4 prior to allowing that worker to conduct steam generator tube maintenance activities. This procedure prohibits a temporary worker from receiving excessive occupational radiation exposure due to previous exposure at other job locations. These NRC regulations to control temporary worker occupation exposures at different locations throughout the United States are effective and there is no need for additional oversight in this area.

During the past four years an average of 286 workers per year received measurable radiation doses from steam generator tube maintenance. This represents an average of 32 percent of the total work force. Of the average 286 steam generator maintenance personnel, 219 were temporary workers. This represents an average of 76 percent of the total workers involved with steam generator tube maintenance, which would be expected, since 73 percent of the total outage work force consists of temporary workers. During this period, Carolina Power & Light Company has not used independent firms to find temporary employees for steam generator maintenance activities.

Carolina Power & Light Company has ordered replacement steam generators and will be prepared to start replacement in late 1983 if necessary. It is estimated that the replacement cost will be approximately \$100,000,000. Since return to power in August 1982, H. B. Robinson Unit 2 has been operating with negligible steam generator tube leakage.

Should you have further questions about H. B. Robinson steam generator tube maintenance activities, please contact us.

Yours very truly,



L. W. Eury
Senior Vice President
Power Supply

EEU/cr (5794C6T2)