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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME: ZIMMERMAN, S. R. AUTHOR AFFILIATION: Carolina Power & Light Co.
 RECIP. NAME: VARGA, S. A. RECIPIENT AFFILIATION: Operating Reactors Branch 1

SUBJECT: Forwards concluding pages of util 820701 & 0916 submittals re steam generator replacement, now notarized, per NRC 821118 ltr. Associated fees & application will be included in final steam generator rept.

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Carolina Power & Light Company

December 30, 1982

Office of Nuclear Reactor Regulation
ATTN: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
STEAM GENERATOR REPLACEMENT

Dear Mr. Varga:

Carolina Power & Light Company (CP&L) has received your letter dated November 18, 1982 stating that the letters we submitted regarding the replacement of steam generators at the H. B. Robinson Steam Electric Plant Unit 2 (HBR2), dated July 1, 1982 and September 16, 1982 should have been submitted under oath or affirmation. We discussed this matter with the NRC Project Manager for HBR2 and agreed that we would send the corrected pages.

The affected pages are enclosed for your use. The associated fees and application will be included in our submittal of the final Steam Generator Repair Report (SGRR) which will be forwarded to your office in the near future.

If you have any further questions regarding this matter, please contact a member of our licensing staff.

Yours very truly,

S. R. Zimmerman
Manager

Licensing & Permits

DCW/cfr (5949C10T2)

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

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ALARA Considerations

Task by task estimates of man rem exposure are being developed for this replacement effort such that radiation exposures can be maintained as low as reasonably achievable (ALARA). Data from previous steam generator replacement efforts are being evaluated in an effort to further reduce potential exposures. Decontamination and temporary shielding will be employed as practicable to limit exposure. When exposures are determined to be critical, each work activity will be practiced on equipment mockups. Employee and contractor health physics (HP) training programs will be tailored to emphasize good HP practices related to SG replacement activities to further reduce potential exposures.

Conclusions

This steam generator repair program at HBR 2 is being conducted to enhance the reliability of the steam generators. The resultant benefits from this enhanced reliability will be reduced unavailability of the plant due to steam generator tube leakage, reduced personnel exposure due to fewer and more infrequent steam generator tube inspections and repair, and improved margins against accidents involving a rupture of the steam generator tubes.

By performing detailed studies and investigations related to the replacement effort, utilizing the recent experience obtained by other utilities as well as using proven manufacturing and construction techniques, CP&L will be able to repair the steam generators in a manner which will result in no adverse impact to the public health and safety.

Carolina Power & Light Company will be putting forth every effort possible to achieve the above schedule. To the extent that NRC review and evaluation of previous SG replacements have shown the absence of unreviewed safety issues, CP&L anticipates that this repair will be an allowable activity under 10CFR 50.59, not requiring NRC issue of a Safety Evaluation Report. Any guidance or recommendations that the NRC could give to expedite the review and approval of this effort would be greatly appreciated. Should you require additional information with regard to these activities, or desire a meeting to

further discuss or expand upon the information above prior to our preliminary report, please contact a member of our licensing staff.

Yours very truly,



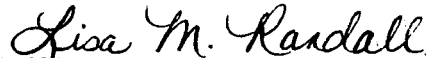
E. E. Utley

Executive Vice President
Power Supply and
Engineering & Construction

DCS/pgp (5926C10T4)

cc: Mr. James P. O'Reilly (NRC-Region II)
Mr. G. Requa (NRR)

Mr. E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.



Notary (Seal)

My commission expires: 5/18/83

Steven A. Varga

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Should you require additional information with regard to these activities, or desire a meeting to further discuss or expand upon the information provided, please contact a member of our licensing staff.

Yours very truly,

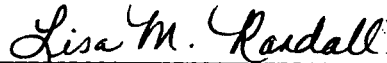


E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

DCS/pgp (5926C10T4)
Attachment.

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

Mr. E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.



Notary (Seal)

My commission expires: 5/18/83