

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8307110058 DOC. DATE: 83/07/01 NOTARIZED: NO DOCKET #  
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 AUTH. NAME AUTHOR AFFILIATION  
 ZIMMERMAN, S.R. *Carolina* Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Forwards final repts on evaluation of qualification of  
 Westinghouse containment fan cooler motors & RHR pump motor  
 to clarify util 830428 response to environ qualification  
 SER.

DISTRIBUTION CODE: A048S COPIES RECEIVED: LTR *1* ENCL *1* SIZE: *3+39*  
 TITLE: OR/Licensing Submittal: Equipment Qualification

## NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL
	NRR ORB1 BC	12	1	0	REQUA, G	01	1 1
INTERNAL:	ELD/HDS1	12	1	1	GC	13	1 1
	IE FILE	09	1	1	NRR CALVO, J		1 1
	NRR/DE/EQB	07	2	2	NRR/DL DIR	14	1 1
	NRR/DL/DRAB	06	1	1	NRR/DSI/AEB		1 1
	REG FILE	04	1	1	RGN2		1 1
EXTERNAL:	ACRS	15	8	8	LPDR	03	1 1
	NRC PDR	02	1	1	NSIC	05	1 1
	NTIS	31	1	1			



Carolina Power & Light Company

JUL 01 1983

SERIAL: LAP-83-271

Director of Nuclear Reactor Regulation  
Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
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  
ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT

Dear Mr. Varga:

SUMMARY

Carolina Power & Light Company (CP&L) has reviewed your letter dated April 28, 1983 concerning clarification of the environmental qualification Safety Evaluation Report (SER) for H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2). Most of the items discussed in your clarification letter have been addressed by CP&L in previous submittals. The section below discusses each of your concerns and provides a response or references previous CP&L submittals.

DISCUSSION

During preparation of the HBR2 response to meet 10 CFR 50.49 requirements, SER Category items I.B, II.A, and IV were reassessed and addressed. Section 3.0 of our May 20, 1983 submittal provided both the reassessment and qualification conclusions on these items. Included in Section 4.0 of that submittal were the back-up technical evaluations to support the qualification conclusions. The single Category IV item, electrical penetrations, was addressed by the resubmittal of the required documentation to NRC on May 20, 1983. At this time, CP&L believes that no changes are required to our previous Justification for Continued Operation (JCO) submittals and that no additional JCOs are required based on our re-evaluations of SER Category items and the NRC SER, issued March 29, 1983, for Category II.B items.

Compliance to paragraph (g) of 10 CFR 50.49 is also discussed in HBR2's May 20, 1983 submittal. Section 2.0 of that report identifies electrical equipment important to safety and provides a schedule for the

8307110058 830701  
PDR ADOCK 05000261  
PDR

A046  
11

qualification or replacement of electrical equipment still undergoing qualification testing. As stated in the report, CP&L believes that this is an on-going program and that electrical equipment will be added to and deleted from this listing based on continuing evaluations by CP&L as well as any future mandated requirements.

Compliance with paragraph (a) of 10 CFR 50.49 has been met to date by the programs in effect at HBR2 to satisfy the requirements of NRC Bulletins, Clarifications, Guidelines, NUREGs, and Technical Evaluations related to Environmental Qualification of Electrical Equipment which have been issued from 1978 through the present. H. B. Robinson Unit No. 2 ninety day responses to IE Bulletin 79-01B, Revisions 1 through 3, have included a section entitled "Report Quality Assurance." This section details the methodology and outlines the chronology associated with the evaluation of environmental qualification of electrical equipment associated with the plant. As a result of the formulation and issuance of 10 CFR 50.49, a plant-specific electrical equipment qualification program for HBR2 is scheduled to be in place by March 31, 1985. This program will allow addition of new or re-evaluated equipment, as well as provide maintenance and logistic direction to enable continuation of qualification levels during plant operation.

Compliance with paragraph (b) of 10 CFR 50.49 is discussed below with each of the subparagraphs (1), (2), and (3) presented separately. The qualification work to date has been performed under the DOR Guidelines issued with IE Bulletin 79-01B, as amended by subsequent NRC letters and clarifications. This work is in compliance with paragraph (b)(1).

The paragraph (b)(2) requirement to include non-safety related equipment which could have deleterious effects on safety-related equipment operation during harsh environment experiences is a more recent requirement not yet fully defined. Carolina Power & Light Company is working with other utilities through the Nuclear Utility Group on Equipment Qualification to come to an understanding with NRC on the interpretation of how this paragraph will be applied. However, review of the HBR2 master list indicates that some equipment in this category is included in the master list as a result of the analysis performed on each safety system. Carolina Power & Light Company will continue to review the safety systems listed in Section 2.4 of our May 20, 1983 response for HBR2 to determine if any additional equipment needs to be added or deleted from this master list. This review will be influenced by any future NRC clarifications and will be an on-going effort throughout the qualification program. Carolina Power & Light Company will continue to apply the Systems Approach in (b)(2) determinations. As stated above, CP&L's qualification program for HBR2 is scheduled to be in place by March 31, 1985.

Paragraph (b)(3) compliance is linked with CP&L's response to Generic Letter 82-33, dated April 15, 1983, concerning Regulatory Guide 1.97 scheduling for HBR2. Instrumentation related to Regulatory Guide 1.97 will be identified and submitted to the NRC for review per the schedules established in our response. Once approved, a determination will be made of qualified equipment and, if required, a schedule will be developed for any additional qualification work necessary.

Mr. S. A. Varga

-3-

The request for identification of proprietary information is addressed in Section 3.2 of our May 20, 1983 submittal. As stated in that section, CP&L's letter to you dated March 18, 1983 listed the current proprietary status of material found in the HBR2 Technical Evaluation Report (TER). No further updating is required at this time.

Section 4.0 of the HBR2 May 20, 1983 submittal included technical reports used to resolve the deficiencies listed in the HBR2 TER. One of the reports, PEI-TR-83-6-8 concerning Westinghouse Motors, was unavailable at the time of the submittal, and is attached to this letter. Please insert the attached report into Section 4.0 of CP&L's May 20, 1983 submittal for HBR2.

If you have any further questions on this subject, please contact our staff.

Yours very truly,



S. R. Zimmerman  
Manager  
Licensing & Permits

ONH/kjr (71740NH)

Attachment

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