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 FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 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 NRC 830620 request for participation in NRC  
 research program addressing Unresolved Safety Issue A-47,  
 "Safety Implications of Control Sys." Participation  
 declined due to lack of resources.

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Carolina Power & Light Company

JUL 19 1983

Mr. Darrell G. Eisenhut, Director  
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  
UNRESOLVED SAFETY ISSUE A-47

Dear Mr. Eisenhut:

Your letter dated June 20, 1983 proposed that Carolina Power & Light Company (CP&L) participate in NRC's research program addressing Unresolved Safety Issue A-47 - Safety Implications of Control Systems. You proposed that the H. B. Robinson Plant be used for A-47 because EG&G Idaho (INEL) is already involved in a computer modeling effort for Unresolved Safety Issue A-49 - Pressurized Thermal Shock.

Your previous letter dated October 25, 1982 stated, with regard to A-47, "Although you have declined participation for now, your representatives at the July 19 meeting agreed that when our refined program plan is completed you would review it and perhaps reconsider your decision to participate in A-47." (Emphasis Added)

We declined to participate in the A-47 project originally because of reservations about the suitability of the NRC's Task Action Plan for resolving this issue and because of the Company resources required to support the project. Company resources are heavily impacted by other issues such as A-49, Pressurized Thermal Shock, Fire Protection, Environmental Qualification and the replacement of the H. B. Robinson Steam Generators. On balance, CP&L does not believe that the priority of the A-47 project is sufficient to warrant redirecting resources from these other projects to support A-47. It is also our belief that the preferred path should be to complete the project on one plant, such as the ongoing work on Oconee, and then review whether enough useful information was gained to warrant doing the analysis on three other plants.

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In reviewing your refined A-47 program, we find we still have concerns which must be answered before we can reconsider our decision not to participate in A-47. I would like to meet with you at your convenience to discuss these concerns. Please let me know when you would be available.

Yours very truly,



L. W. Eury  
Senior Vice President  
Power Supply

JJS/cfr (6913JJS)

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