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

SUBJECT: Forwards slide presentation entitled "Steam Generator Insp Results," delivered at 830715 meeting w/NRC & addl info requested at meeting. Approval for proposed operating interval of 4.5 EFPM requested by 830815.

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Carolina Power & Light Company

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AUG 10 1983

Office 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
Steam Generator Inspection Intervals

Dear Mr. Varga:

On July 15, 1983, Carolina Power & Light Company (CP&L) made a presentation to you and your staff concerning the next Steam Generator inspection interval for H. B. Robinson Unit No. 2 (HBR2). The purpose of this letter is to document the information provided in that meeting and to provide additional information requested by you at the meeting.

Attachment 1 provides copies of the presentation slides used at our July 15 meeting. It should be noted that the safety basis for establishing the next Steam Generator inspection interval of 4.5 effective full power months (EFPM) was contained in our letter of July 8, 1983. This letter will deal with the management aspects of the proposed operating interval of 4.5 EFPM.

Carolina Power & Light Company had originally planned to replace the Robinson Steam Generators in an extended refueling outage beginning in January, 1984. It is unlikely, however, that the pending license amendment proceeding can be concluded, and the amendment issued, prior to January, 1984. For these reasons and in order to maximize the efficiency of the unit, CP&L believes that it is necessary and prudent to reschedule the commencement of the replacement outage to May or June, 1984. The Cycle 9 core does not have enough remaining energy to allow operation until that time frame. Therefore, CP&L must design an operating and outage schedule which meets the constraints imposed by safety and regulatory concerns while maximizing the

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benefit of continued operation of the unit to the public. Carolina Power & Light Company believes that the proposed operating interval of 4.5 EFPM accomplishes this objective for the following reasons:

- 1) The proposed operating interval is conservative as shown in our July 8, 1983 letter.
- 2) The proposed operating interval allows CP&L to operate to the end of Cycle 9, conduct a refueling and Steam Generator inspection in late 1983, and then operate the unit until the needed license amendment is obtained (approximately 3 EFPM into Cycle 10).
- 3) The proposed operating interval allows CP&L to install at the earliest opportunity a very low flux core based on our PLSA design (see our letter of April 1, 1983). As stated in our letter of July 26, 1983 this serves to resolve the Pressurized Thermal Shock issue at an earlier date.
- 4) The proposed operating interval of 4.5 EFPM will eliminate one outage and, thereby, help minimize radiation exposure. Additionally, transients due to startup and shutdown are minimized.
- 5) The proposed operating interval allows the unit to be operated at maximum power through the winter peak demand for electricity and avoids the possibility of the unit exhausting the installed fuel and sitting idle awaiting a Steam Generator Replacement license amendment. This provides maximum benefit to the public.

As was discussed with you at our meeting, a number of commitments exist for HBR2 which were to be implemented during the next refueling outage. When CP&L made those commitments, it was planned that the next refueling outage would be during the Steam Generator Replacement Outage which would have begun in January, 1984 with completion in late 1984. As mentioned above, the replacement outage is now scheduled to begin around May-June, 1984. By necessity, several of the refueling commitments must shift with the shift in the outage schedule. The refueling at the end of 1983 will be a minimum length outage designed only to refuel the reactor and inspect steam generator tubes (eight weeks). However, the time frame in which these rescheduled refueling commitments will now be completed is approximately the same as planned since the outage has only slipped by a few months. Attachment 2 to this letter lists the commitments associated with the next refueling outage, CP&L's proposed disposition of each commitment, and the basis for that disposition. It should be noted that in all cases, existing plant systems and procedures will ensure continued safe operation.

One area of commitment warrants special mention. 10 CFR 50.44, which deals with hydrogen control measures, requires the installation of Reactor Coolant System Vents and the capability to install an external recombiner "by the end of the first scheduled outage beginning after

Mr. S. A. Varga

-3-

July 5, 1982 and of sufficient duration to permit required modifications" (Emphasis added). The Reactor Coolant System Vent modification will be completed during the refueling outage. The system, however, will not be declared operable pending the completion of NRC Staff review of the system design and the implementation of the upgraded Emergency Operating Procedures (EOPs). Upon completion of the Staff design review and implementation of the EOPs (see Attachment 2I), the system will be placed into operation. CP&L believes that this is consistent both with the requirements of 10 CFR 50.44 and NUREG 0737 Item II.B.1.

With respect to the recombiner capability modification, the first scheduled outage "of sufficient duration" has always been the Steam Generator Replacement Outage. By necessity, the Replacement Outage scheduled start has slipped but the recombiner capability modification is still scheduled to be accomplished during the same outage as previously planned. The hydrogen recombiner capability modification cannot be accomplished during the short refueling outage due to both procurement and construction time constraints (see Attachment 2B). Therefore, H. B. Robinson will continue to be in conformance with 10 CFR 50.44 and no exemption from that rule is being sought.

We trust that this letter is responsive to your needs. Carolina Power & Light Company requests that you review this information and that contained in our letter of July 8, 1983 and provide approval for the proposed operating interval of 4.5 EFPM. Approval is requested by August 15, 1983 to facilitate our planning for the next outage and our assignment of resources. If you have any questions on this subject, please contact our staff.

Yours very truly,



B. J. Furr
Vice President
Nuclear Operations

JJS/kjr (7479JJS)
Attachment

cc: Mr. J. P. O'Reilly (NRC-R11)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)