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 CUTTER, A.B. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Forwards "Pressure Safety & Relief Line Evaluation
 Summary Rept, CP&L, HB Robinson, Unit 2," in response to NUREG-
 0737, Item II.D.1, reflecting mods resulting from IE Bulletin
 79-14, Continued operation justified.

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Carolina Power & Light Company

SERIAL: LAP-83-161

AUG 30 1983

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
NUREG-0737 ITEM II.D.1
PRESSURIZER SAFETY AND RELIEF VALVE
PIPING SYSTEM EVALUATION

Dear Mr. Varga:

Carolina Power & Light Company (CP&L) is hereby submitting the revised "Pressurizer Safety and Relief Line Evaluation Summary Report" for H. B. Robinson Unit No 2 (HBR2). The attached report supersedes the previous report submitted by our letter dated December 28, 1982, which was based on the best available information at that time. Since then, the "as-built" drawings have been revised to include modifications which were a result of IE Bulletin 79-14. The revised "as-built" information has been incorporated into the attached report.

In accordance with our letter to you of December 28, 1982, CP&L installed temperature measuring devices during the May 1983 Steam Generator Inspection Outage to verify the loop seal temperatures assumed in the vendor's analysis. Due to malfunctions in the data collection equipment, the data was not obtained until early August 1983. Results of the data collected indicate that loop seal piping temperatures upstream of the pressurizer safety valves are below the temperature range assumed by the vendor. This results in higher loadings on the piping and supports in the event of safety valve discharge.

A review was performed to ensure that a safety concern did not exist with continued operation under current conditions. Based on this review, it is our position that continued operation is not a safety concern for the following reasons:

- 1) The likelihood of a safety valve actuation is very remote since the safety valves have not been challenged during the past thirteen years of operation.

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- 2) A study has been conducted on the loop seal piping of a plant similar to HBR2. The study indicated that while safety valve actuation with a cold loop seal may cause plastic deformation of piping and supports, no failure of these components will occur.
- 3) EPRI testing has shown that the Crosby safety valve should reseal properly after two-phase flow conditions and thereby provide positive flow control.
- 4) The valve vendor was contacted, and they informed CP&L that the safety valves will function properly under cold loop seal conditions.

In addition, the loop seal is currently being evaluated to determine what modifications are necessary to raise its temperature to the range assumed by the vendor. Any modifications will be scheduled for the earliest outage of sufficient length. This will most likely be the Steam Generator Replacement Outage which is currently scheduled to begin approximately June 1984. As an interim measure, in the unlikely event that the safety valves should lift, an in-depth inspection will be performed on piping and supports to determine the extent of damage, if any, and additional appropriate actions would be taken at that time.

If you have any questions on this subject, please contact a member of my staff.

Yours very truly,



A. B. Cutter
Vice President

Nuclear Engineering and Licensing

ONH/cfr (67920NH)

Attachment

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