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

SUBJECT: Forwards "Fire Protection App R - Section III.G Supplemental Submittal," describing substitution of manual actions & repairs & revising shutdown method to reflect use of refueling water storage tank.

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Extras To NRR ORB#1BC

CP&L**Carolina Power & Light Company**

P. O. Box 1551 • Raleigh, N. C. 27602

FEB 06 1984

SERIAL: NLS-84-030

E. E. UTLEY**Executive Vice President****Power Supply and Engineering & Construction**

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
APPENDIX R - SECTION III.G
SUPPLEMENTAL SUBMITTAL

References

1. U.S. NRC letter from Mr. D. G. Eisenhower to Mr. E. E. Utley dated November 22, 1983.
2. Carolina Power & Light Company letter from Mr. E. E. Utley to Mr. S. A. Varga dated January 31, 1984.

Dear Mr. Varga:

In a March 16, 1982 submittal, Carolina Power & Light Company (CP&L) submitted its evaluation of H. B. Robinson Unit No. 2 to the specific requirements of 10 CFR 50 Appendix R, Section III.G. In this submittal, CP&L committed to upgrade its existing hot shutdown capability and to provide the capability to achieve cold shutdown in accordance with the requirements of Appendix R. These commitments involved making plant modifications to provide additional remote shutdown capability.

In July 1982 and the ensuing months, the Nuclear Regulatory Commission (NRC) wrote clarification correspondence, held meetings, and issued Safety Evaluation Reports to other utilities regarding Appendix R. Carolina Power & Light Company utilized this information to further evaluate the acceptability of (1) manual operation of equipment (valve manipulation, etc.) required for hot standby, and (2) repair of equipment required for cold shutdown.

Carolina Power & Light Company conducted an extensive review of existing plant capabilities and determined that a revised approach would maintain compliance with Section III.G of Appendix R. The results are contained in the attached "Appendix R - Section III.G Supplemental Submittal" which describes substitution of manual actions and repairs via procedures in lieu of previously-identified plant modifications (from our March 16, 1982

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submittal). This supplemental submittal essentially maintains our previously-proposed shutdown method. However, the shutdown method has been revised to reflect use of the Refueling Water Storage Tank (RWST) in lieu of the boric acid system; also, pressurizer heaters, let-down system, and PORVs are assumed not available. The text of the submittal provides details regarding substituted modifications, new procedures, repairs, justifications, and assumptions.

Prior to CP&L completing the attached supplemental submittal, the NRC issued Reference 1 which concludes that CP&L's safe shutdown method and proposed modifications (from our March 16, 1982 submittal) are acceptable. The attached submittal, in conjunction with our March 16, 1982 submittal, describes CP&L's revised method for achieving compliance with the requirements of Section III.G of Appendix R. We are certain that NRC acceptance of the attached submittal will enable CP&L to attain compliance with Appendix R earlier than if compliance were to be achieved as described in Reference 2.

Contingent upon early NRC concurrence, CP&L can complete the physical plant modifications, including related lighting changes (Section III.J), described in the attached submittal during the Steam Generator Replacement (S/GR) outage which is currently scheduled from July, 1984 through May, 1985. Procedures and the related training will be completed by three months after startup from the S/GR outage. Thus, compliance with Sections III.G and III.J of Appendix R will be achieved significantly earlier than it could be achieved per References 1 and 2. To the extent necessary, CP&L hereby requests an exemption from the provisions of 10 CFR 50.48 to permit CP&L to complete compliance with Sections III.G and III.J of Appendix R by three months after startup from the S/GR outage, when it occurs.

In order to accomplish our mutual goal of improving plant safety by timely compliance with Appendix R, CP&L urges the staff to review the attached supplemental submittal as soon as possible. We ask that the staff provide its supplemental evaluation by early March 1984 so that CP&L may begin full implementation. Our staff will be pleased to assist NRC in any manner to facilitate your review. Please contact us should you have any questions regarding this information.

Thank you for your early consideration in this matter.

Yours very truly,



E. E. Utley

JAM/cfr (9345JAM)
Attachment

cc: Mr. N. Fioravante (NRC-ASB)
Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. J. Stang (NRC-CHEB)
Mr. Steve Weise (NRC-HBR)