



Carolina Power & Light Company

OCT 25 1983

SERIAL: LAP-83-492

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  
REQUEST FOR EXEMPTION FROM THE REQUIREMENTS OF 10 CFR 73.55

Dear Mr. Varga:

Pursuant to 10CFR50.12(a), 10CFR50.54(p), and 10CFR73.5, Carolina Power & Light Company ("CP&L" or "the Company") hereby petitions the Nuclear Regulatory Commission ("NRC" or "the Commission") for an exemption from the requirements of 10CFR73.55 with respect to the H. B. Robinson Steam Electric Plant Unit No. 2 ("HBR2" or "Robinson") during the course of the forthcoming steam generator repair program ("SGRP") described as follows. Due to the broad scope of the SGRP, specific exemptions in each area requiring relief would be impractical due to the number of exemptions required. Instead, a general exemption request is being sought to simplify the attendant reviews and associated administrative requirements.

Commencing approximately July 21, 1984, Robinson will undergo an extensive outage for the repair of steam generators and modification or installation of associated support systems and facilities. The expected duration of this outage is approximately forty three (43) weeks. Due to the nature of the work to be performed in the reactor containment building, all fuel will be removed from the reactor and stored in the spent fuel pool housed in a separate spent fuel handling building. In addition to the above work several new buildings will be constructed to support future plant operations. Major construction activities include the following:

1. Construction of a condensate polishing building to house the new condensate polishing system,
2. Construction of an environmental and radiation control office and laboratory building,
3. Construction of a steam generator storage facility to house the old steam generator lower assemblies,

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4. Modifications to the security system,
5. Expansion of the protected area to enclose certain new facilities and provide additional laydown area, and
6. Significant repair work to be conducted within containment involving replacement of major steam generator components.

Since the plant status for the major portion of this outage will be refueling shutdown with the reactor vessel defueled, the areas in which there will be an opportunity for radiological sabotage to occur will be drastically reduced if not eliminated. It is CP&L's intention that the current provisions of the security plan would remain in effect until the fuel is moved from the reactor to the spent fuel pool. At the present time it is estimated that all fuel will have been transferred to the spent fuel pool approximately 21 days from the date hot shutdown is achieved.

As the specifics of the exemption being sought involve Safeguards Information, the information in the attached Appendix should be protected in accordance with the provisions of 10CFR73.21. The attached information in the Appendix discusses the specifics of the exemption being sought and the compensatory measures to be taken.

The Company recognizes its responsibility for maintaining an adequate level of security and is fully prepared to implement the measures necessary to protect Robinson against radiological sabotage or theft of special nuclear material. The measures considered necessary to prevent radiological sabotage or theft of special nuclear material are delineated in the Appendix.

The intent of this exemption request is to allow a relaxation of certain security requirements in areas where safety related operations will not be performed during the SGRP, i.e., in areas which will not be used to contain spent fuel. In that respect, all security measures presently required or an appropriate compensatory measure to protect the spent fuel will continue to be in force for the area in which the spent fuel is stored. Because the effectiveness of the security/safeguards system will not be reduced where it affects the protection of the maintenance of spent fuel, the exemption request does not reduce the safety margin afforded by the security plan and therefore this exemption request will not endanger life or property or the common defense and security. This exemption is in the public interest because, if granted, the exemption will enable CP&L to expedite the completion of the repair program.

In accordance with 10CFR170.22 this exemption request is judged to be a Class III approval request in that it involves a single safety issue and does not involve a significant hazards consideration. As such, please find enclosed a check in the amount of Four Thousand Dollars (\$4000.00) in payment of the appropriate license fee.

The Company appreciates your cooperation in the consideration of this exemption request and stands ready to meet with you at your convenience to discuss the details of this matter and any questions which you or your staff may have. As noted above, the present schedule calls for the SGRP outage to

Mr. Steven A. Varga

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begin on July 21, 1984. In order that we may have sufficient time to develop and implement the necessary modifications to existing procedures and prepare any new procedures, CP&L requests that you complete your review and approval by May 21, 1984.

Yours very truly,

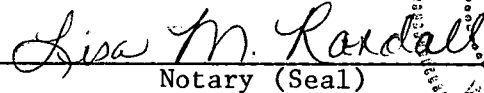


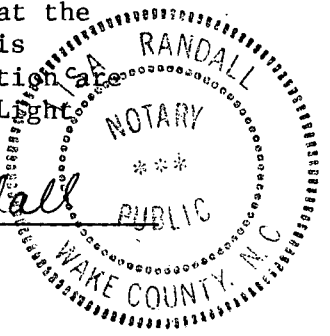
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

DCS/ccc (8146DCS)  
Attachment: Appendix

cc: Mr. J. P. O'Reilly (NRC-RII) W/A\*  
Mr. G. Requa (NRC)  
Mr. Steve Weise (NRC-HBR)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

  
Notary (Seal)



My commission expires: 5/18/88

\* Only those individuals with W/A (with Appendix) following their names are to receive copies of the letter and Appendix. All other individuals and files to receive the letter only.