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 AUTH. NAME AUTHOR AFFILIATION
 VAUGHN, G.E. Carolina Power & Light Co.
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SUBJECT: Suppls 900319 response to Generic Ltr 89-19 re automatic reactor vessel overfill protection. Based on results of field verification, existing overfill protection sys satisfies design by Group I of Westinghouse plants.

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G. E. VAUGHN
Vice President
Nuclear Services Department

MAY 07 1991

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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ADDITIONAL INFORMATION REGARDING GENERIC LETTER 89-19

Gentlemen:

On September 20, 1989, the NRC Staff issued Generic Letter 89-19, which provided recommendations concerning automatic steam generator overflow protection for all PWR plants and automatic reactor vessel overflow protection for all BWR plants. The Generic Letter also recommended that plant procedures and Technical Specifications for all plants include provisions to verify periodically the operability of the overflow protection and to assure that automatic overflow protection is available to mitigate main feedwater (MFW) overfeed events during reactor power operation. The Generic Letter required licensees to provide notification to the NRC by March 19, 1990 of intent to implement the recommendations of the Generic Letter, including anticipated schedule for implementation; or provide appropriate justification for not implementing these recommendations.

Carolina Power & Light Company's (CP&L) response dated March 19, 1990 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) discussed how the plant currently complies with the Generic Letter recommendations but identified the need to perform a walkdown to verify the routing of power supply cables for the overflow protection systems and MFW control system. The walkdowns were completed during Refueling Outage No. 13 as committed.

The walkdown was needed due to a potential routing problem based on common tray references taken from the Cable/Conduit Listing (CCL). The initial CCL review was supplemented by walkdown to determine specific cable locations within a tray. The subsequent review indicated that the protection cables for different channels do not share a common routing, and that only one protection channel shared common routing with the control channel in a given section of tray. Therefore, each routing interface with MFW control only involves a single protection channel, such that two level-overflow protection channels remain operable in the event of a fire in the control portion of the MFW control system.

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Based on the results of the field verification and the information provided in our letter of March 19, 1990, the overfill protection system is considered sufficiently separate from the MFW control system to ensure operability. The existing HBR2 overfill protection system adequately satisfies the recommended design encompassed by Group I of Westinghouse-Designed PWR Plants discussed in Enclosure 2 to Generic Letter 89-19.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,


G. E. Vaughn

JSK/jbw (1093RNP)

G. E. Vaughn, 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.

Eleanor C. Chappell

Notary (Seal)

My commission expires: 2/6/96

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo

