

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9112270275 DOC.DATE: 91/12/19 NOTARIZED: YES DOCKET #
 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Powe 05000324
 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Powe 05000325
 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400

AUTH.NAME AUTHOR AFFILIATION
 VAUGHN,G.E. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards initial response to Generic Ltr 88-20, Suppl 4,
 "Individual Plant Exam for Severe Accident Vulnerabilities."

DISTRIBUTION CODE: A011D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
 TITLE: Generic Ltr 88-20 re Individual Plant Evaluations

NOTES:Application for permit renewal filed. 05000400

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID	CODE/NAME	LTTR	ENCL		ID	CODE/NAME	LTTR	ENCL
	PD2-1	PD	1	1		LO,R	1	1	
	LE,N.		1	1		MOZAFARI,B.	1	1	
INTERNAL:	ACRS	HOUSTON,M.	1	1		AEOD/DSP/TPAB	1	1	
	NRR	HERNAN,R.	1	1		NRR/DREP/PRAB	2	2	
	REG	1	1	1		REG 2	1	1	
	REG	3	1	1		REG 4	1	1	
	REG	FILE	1	1		RES FLACK,J.	6	6	
	RES	MITCHELL,J.	1	1		RES/DSIR/SAIB/B	7	7	
EXTERNAL:	NRC	PDR	1	1		NSIC	1	1	

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 30 ENCL 30

MAY



Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

DEC 19 1991

SERIAL: NLS-91-326
10CFR50.54(f)

G. E. VAUGHN
Vice President
Nuclear Services Department

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62

RESPONSE TO INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS FOR SEVERE
ACCIDENT VULNERABILITIES - 10CFR50.54(F) (GENERIC LETTER NO. 88-20,
SUPPLEMENT 4)

Gentlemen:

The purpose of this letter is to provide Carolina Power & Light Company's (CP&L) initial response to Generic Letter 88-20, Supplement 4. This Generic Letter requested licensees to perform an Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities and submit the results to the NRC. Licensees were also requested to submit a description of their proposed programs for completing the IPEEEs within 180 days from the issuance of the Generic Letter.

The enclosure to this letter provides CP&L's proposed program for the IPEEEs for the H. B. Robinson Steam Electric Plant, Unit No. 2, the Shearon Harris Nuclear Power Plant, and the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. Specifically, the enclosure identifies the proposed method selected for addressing each external event, as well as the proposed schedule for completing the IPEEEs.

Should you have any questions regarding this matter, please contact Mr. S. D. Floyd at (919) 546-6901.

Yours very truly,

G. E. Vaughn

9112270275 911219
PDR ADOCK 05000261
P PDR

ADH

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.

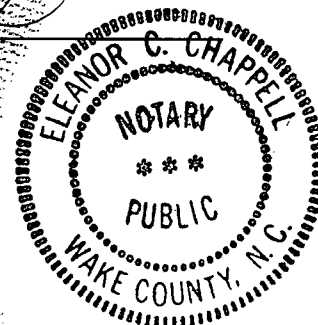
Eleanor C. Chappell
Notary (Seal)

My commission expires: 2/6/96

DBB/tcv (1421GLU)

Enclosure

cc: Mr. S. D. Ebnetter
Mr. L. Garner
Mr. N. B. Le
Mr. R. Lo
Ms. B. L. Mozafari
Mr. R. L. Prevatte
Mr. J. E. Tedrow



**EXTERNAL HAZARDS - PROPOSED METHOD FOR PERFORMANCE OF
IPEEE AND SCHEDULE FOR PERFORMING IPEEES**

I. External Events and Proposed Methods

Seismic Events

As recommended in the Generic Letter, Carolina Power & Light Company (CP&L) will integrate the resolution of USI A-46 with the IPEEE for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) and the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP). The EPRI Seismic Margin Methodology described in the Generic Letter will be used at all CP&L sites (Shearon Harris Nuclear Power Plant (SHNPP), HBR2, and BSEP). Enhancements as listed in Appendix 1 of the Generic Letter will be incorporated.

Internal Fires

CP&L currently plans to use the NUMARC fire vulnerability evaluation (FIVE) methodology for HBR2 and SHNPP. CP&L expects to update the Brunswick Plant's fire risk analysis that was submitted in May 1988 and reviewed in NUREG/CR-5465. CP&L will address the internal fires IPEEE issues discussed in the Generic Letters and in NUREG-1407 as appropriate.

High Winds and Tornados, Floods, Transportation, and Nearby Facility Accidents

For the IPEEE analyses requested for these potential occurrences, CP&L expects to apply a progressive screening-type approach to conduct these evaluations similar to that described in NUREG-1407. The recommendations from the Generic Letter and NUREG will be followed as applicable to each plant.

II. Schedule

CP&L's integration plans for A-46 and IPEEE include combining walkdowns; i.e., the information required for the IPEEE will be gathered on the currently scheduled A-46 walkdown. As indicated in CP&L's response to the NRC Staff Safety Evaluation Report (SER) on Revision 0 of the General Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG), the walkdown outage dates are contingent upon a number of factors. CP&L intends to perform the walkdowns by the conclusion of the second refueling outage after the final SER is issued, open items are resolved, and SQUG training is completed. If these items are completed by the first quarter of 1992, walkdowns for CP&L's A-46 plants would be currently scheduled as follows:

Robinson Plant	Reload 15	Begin October 1993
Brunswick Unit 1	Reload 9	Begin March 1994
Brunswick Unit 2	Reload 11	Begin September 1994

After completion of the A-46/IPEEE walkdowns for these three units, IPEEE analysis and documentation will commence in the same order as above. Final IPEEE submittals would be provided as follows:

Robinson Plant	June 1995
Brunswick Unit 1	December 1995
Brunswick Unit 2	June 1996
Shearon Harris Plant	June 1997

This schedule will allow CP&L personnel currently working toward the 1993 completion of the SHNPP Individual Plant Evaluation (Internal Events) to participate in the pre-outage activities and walkdowns for A-46 and IPEEE.

The walkdown and IPEEE analysis for SHNPP is scheduled to follow final documentation of HBR2 and BSEP. The extended schedule for SHNPP is justified because of CP&L's resource commitments for HBR2 and BSEP and our estimate of low seismic, fire, and other external event risks for SHNPP. SHNPP was designed, constructed, and licensed in accordance with the Standard Review Plan and CMEB BTP 9.5.1 and, as such, already meets stringent seismic, fire, and other external event criteria. In addition, by comparing the seismic hazard to the plant design spectrum, adequate basis exists to justify the proposed schedule.

Furthermore, the internal events PRA preliminary results for SHNPP indicate a low estimated core damage frequency and no potentially significant vulnerabilities. In CP&L's judgement, the SHNPP IPEEE results will be similar.

CP&L believes that potential vulnerabilities to severe accidents are much more likely to be caused by internal events. Consequently, CP&L intends to devote resources to completing IPEs before beginning work on the IPEEEs.