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SUBJECT: Responds to NRC Bulletin 88-010, "Nonconforming Molded-Case Circuit Breakers."

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A. B. CUTTER  
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  
RESPONSE TO NRC BULLETIN NO. 88-10  
NONCONFORMING MOLDED-CASE CIRCUIT BREAKERS

Gentlemen:

Carolina Power & Light Company (CP&L) hereby submits information requested by NRC Bulletin No. 88-10 "Nonconforming Molded-Case Circuit Breakers" for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). The Bulletin requested that licensees take actions to provide reasonable assurance that molded-case circuit breakers (MCCBs) purchased for use in safety-related applications, without verifiable traceability to the circuit breaker manufacturer (CBM), perform their safety functions. The applicability to HBR2 of the actions requested and the reporting requirements are described below.

The Bulletin was issued on November 22, 1988, 10 days following the start of HBR2 Refueling Outage No. 12. At the time the Bulletin was issued, HBR2 had an ongoing program to change out MCCBs for reasons other than those contained in the Bulletin. By the completion of Refueling Outage 12 on February 25, 1989, all but two of the MCCBs located in safety-related Motor Control Centers 5, 6, 9, and 10 (which contain the MCCBs addressed as potential concerns in the Bulletin) had been replaced with more reliable models. The two remaining MCCBs associated with HVH 5A and 5B are original equipment installation, prior to 1971 and therefore are not applicable to the requirements of the Bulletin.

These new type MCCBs, and spares for stock were supplied to HBR2 under a 10CFR50, Appendix B QA program as safety-related components, or under a safety-related program which included testing and documentation to provide assurance that the MCCBs meet safety-related requirements and are traceable to the CBM.

The circuit breakers removed from the safety-related applications at HBR2 will be placed in Plant stock for use in nonsafety-related applications only. MCCB spares in stock for future use in safety-related applications were procured via the same CP&L purchase orders and at the same time as those procured as replacements for Motor Control Centers 5, 6, 9, and 10 addressed above. Therefore, the MCCBs applicable to NRC Bulletin No. 88-10 in safety-related applications, and spares for future use, have been verified to be traceable to the CBM.

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HBR2 will maintain a file of information obtained in the review process for a period of five years, per the requirements of Action Item No. 6 of the Bulletin.

For MCCBs purchased after August 1, 1988, CP&L will comply with the requirements of Action Item No. 7 of the Bulletin, prior to installation. HBR2 has initiated additional procurement controls to assure that future MCCBs are either procured via a 10CFR50, Appendix B QA program, or include procurement requirements to provide documentation which establishes traceability to the CBM.

If you have questions concerning this information, contact Mr. L. I. Loflin at (919) 546-6242.

Yours very truly,



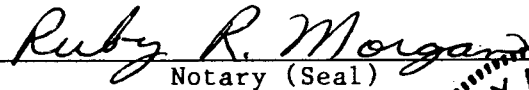
A. B. Cutter

ABC/JCP/crs (274CRS)

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

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.

My commission expires: 11/27/89

  
Notary (Seal)

