

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8802050073 DOC. DATE: 88/01/29 NOTARIZED: NO DOCKET #
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S. R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Requests clarification of inconsistencies between
 justification in 870730 SER review granting 10CFR50, App R
 exemptions & justification in util 840629 & 850116 ltrs
 requesting exemptions.

DISTRIBUTION CODE: A006D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR/Licensing Submittal: Fire Protection

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-1 LA	1 0	PD2-1 PD	5 5
	ECCLESTON, K	1 1		
INTERNAL:	ARM/DAF/LFMB	1 0	NRR WERMEIL, J	1 0
	NRR/DEST/ADS	1 1	NRR/DEST/PSB	1 1
	OGC/HDS1	1 0	<u>REG FILE</u> 01	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

TOTAL NUMBER OF COPIES REQUIRED: LTTR 16 ENCL 0
~~12~~



Carolina Power & Light Company

JAN 29 1988

SERIAL: NLS-88-008
10CFR50, APPENDIX R

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
CLARIFICATION OF APPENDIX R EXEMPTIONS

Gentlemen:

By letter dated July 30, 1987, the NRC granted exemptions from certain requirements of Section III.J of 10CFR50, Appendix R, for the H. B. Robinson Steam Electric Plant, Unit No. 2. A review of the Safety Evaluation Report (SER) accompanying those exemptions has identified inconsistencies between the justification provided within the SER and the justification which Carolina Power & Light Company (CP&L) presented in the June 29, 1984 and January 16, 1985 letters requesting the exemptions. These inconsistencies need to be rectified to ensure that the respective positions have been accurately conveyed and documented.

The June 29, 1984 request for exemption sought relief from the requirement to provide fixed, 8-hour, battery-powered emergency lighting units for areas requiring cold shutdown manual operations, repairs, and access and egress routes thereto. As an alternative, CP&L proposed to "provide dedicated portable emergency lighting for those areas." However, page 2 of the NRC SER states, "The licensee also requested an exemption for the Containment and Residual Heat Removal (RHR) pit areas where manual, cold shutdown operations are required and/or where possible repairs may be needed." The request used the containment and RHR pit only as examples for which cold shutdown manual operations and repairs might be required. In addition, page 4 of the SER states in part "sufficient time is available for the licensee to take appropriate action to re-energize the normal containment lighting units prior to containment entry." This position was not proposed within the exemption request, and CP&L has been unable to identify any time during consideration of this request that such a justification may have been presented. Furthermore, CP&L has no evaluation on file that would substantiate the capability to restore normal containment lighting within the specified time constraints. The January 16, 1985 request sought relief for providing fixed eight-hour battery-powered lighting exterior to the Auxiliary Building for transit to the Safety Injection (SI) pump room. This request was an independent request, not a supplement to the June 29, 1984 request as stated in the SER and did not seek relief related to access routes for the charging pump room, component cooling water heat exchanger room, or the battery room.

8802050073 880129
PDR ADDCK 05000261
P PDR

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

A006
1/0

Accordingly, CP&L requests that the SER be revised to correctly reflect our originally stated basis that use of dedicated portable emergency lighting adequately fulfills the intended functional requirements of III.J for those areas where cold shutdown operation and repair activities would take place including access and egress routes thereto. In addition, the SER should properly reflect that portable hand-held lighting for exterior access paths for transit to and from the SI pump room is acceptable.

Yours very truly,



S. R. Zimmerman
Manager

Nuclear Licensing Section

MDM/lah (2453NEL)

cc: Dr. J. Nelson Grace
Mr. R. Lo
NRC Resident Inspector - RNP