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SUBJECT: Responds to NRC 880729 generic SER on resolution of USI
 A-46.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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RESPONSE TO GENERIC SER ON RESOLUTION OF UNRESOLVED SAFETY ISSUE A-46

Gentlemen:

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter to Mr. Shao, dated August 19, 1988, SQUG clarified that the 60 days would expire on October 7, 1988. This letter responds to that request.

According to the generic schedule submitted by SQUG in its October 9, 1987 letter, the GIP was to be completed by the end of calendar 1988, followed by NRC review in the first quarter of 1989. Given the delay in SER issuance, this objective is probably no longer achievable. Completion of the GIP in the first quarter of 1989 is dependent upon: (1) satisfactory and timely resolution of all outstanding issues, (2) accomplishment of all interim milestones as set forth in the schedule, and (3) continued agreement between SQUG and NRC on major technical and licensing issues.

As the SER acknowledges, the GIP is not yet complete. Several technical areas have not yet been fully included in the GIP. Moreover, the SER does not resolve certain licensing issues central to completion of the GIP raised in Part I of Revision 0. Carolina Power & Light Company will not be in a position to establish the scope of its A-46 commitment until the GIP is completed and all licensing issues resolved. Given the magnitude of the effort required to achieve resolution of USI A-46, final implementation must be carefully integrated into outage schedules. Assuming no significant changes in the work scope currently envisioned for resolution, the plant walkdown associated with the resolution of this issue can be undertaken by the conclusion of the second refueling outage after the final SER is issued and open items resolved, and SQUG training is completed.¹

¹ This schedule is contingent upon a number of factors including: (1) those noted above, (2) the scope and schedule for the conduct of SQUG training, and (3) the resource problem created by many licensees competing for use of limited industry expertise available to assist such efforts.

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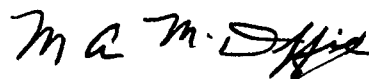
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Identification of safe shutdown equipment and other tasks necessary to prepare for the walkdown will be accomplished after SQUG training but prior to this outage. If the GIP is completed during the first quarter of 1989, a final SER with no open items or significant change in work scope is issued in the second quarter of 1989, and SQUG training seminars are completed in the fourth quarter of 1989, identification of safe shutdown equipment and other preparatory tasks would commence on the first quarter of 1990. The walkdowns would be completed for H. B. Robinson Steam Electric Plant, Unit No. 2 on the outage for Reload No. 16 currently scheduled to begin in December 1992; Brunswick Steam Electric Plant (BSEP), Unit No. 1 on the outage for Reload No. 8 currently scheduled to begin in February 1992; and for BSEP, Unit No. 2 on the outage for Reload No. 10 currently scheduled to begin in September 1992. If the schedule for GIP development and NRC review slips further, the walkdown and other activities would have to be delayed.

Carolina Power & Light Company will review the final GIP after approval by the NRC and resolution of all outstanding issues. Based on this review, CP&L will either commit to pursue a generic resolution of USI A-46 or file a plant-specific response. Should the generic resolution be pursued, CP&L may, at its option, elect not to perform certain aspects of the generic program based upon suitable justification. CP&L also reserves the right to pursue all available appeal options under the backfit rule, 10CFR50.109, particularly if early walkdowns demonstrate that the benefits associated with all or parts of the generic resolution of USI A-46 have been substantially overestimated or costs substantially underestimated.

If you have any questions, please call me at (919) 836-6663. For detailed questions by your staff, please contact Mr. Pedro Salas at (919) 836-8015.

Yours very truly,



M. A. McDuffie

PSA/lah (5460PSA)

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