

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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SUBJECT: Informs of util intention re work planned for upcoming Refueling Outage 12.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
INFORMATION REPORT ON UPGRADE OF THE  
LOW VOLTAGE FIRE DETECTION AND ACTUATION SYSTEM

Gentlemen:

The purpose of this letter is to inform the NRC of Carolina Power and Light Company's intention regarding work planned during the upcoming Refueling Outage 12 at Robinson Unit 2 which will affect equipment covered under the Plant Fire Protection Technical Specifications. Specifically, during the Outage the low voltage Fire Detection and Actuation System will be taken out of service to perform a system upgrade currently scheduled to begin on November 16, 1988.

The following is a discussion of the various features affected and the corresponding compensatory action to be taken to ensure an adequate level of fire protection during the period:

With the Fire Detection and Actuation System out of service the automatic fire suppression systems will be incapable of automatic actuation. During portions of this modification, the Zone 1 and 2 (Diesel Generators) CO<sub>2</sub> System (Sketch A) will be completely out of service and disconnected for piping and pressure switch replacements.

The Halon System for Zones 19 and 20 (Sketch B) will be capable of manual actuation throughout this project but damper actuation will be inoperable.

The CO<sub>2</sub> System for Zones 9 and 10 (Sketch A) will be operable similar to the Zone 19 and 20 Halon System.

The Preaction Sprinkler Systems for Zones 12 and 24 (Sketches B & C) will require isolating during portions of the modification, for interface work.

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The systems will be returned to service prior to power operations following the outage. While the systems are out of service, compensatory action as outlined in the Fire Protection Technical Specifications will be taken as shown on Table 1 below:

Table 1

<u>Tech. Spec.</u>	<u>Area</u>	<u>Fire Detection Zone</u>	<u>Reason for Coverage</u>	<u>Compensatory Action</u>
3.14.1.1 Table 3.14.1	RHR Pit	27	RHR Pumps Core Cooling	Temporary Fire Detection System
	RCP-B	25B	Valve, RHR Suction	Temporary Fire Detector System Inspection once per shift.
	CV Electrical Penet. Area	24	Electrical	Temporary Fire Detector System. Inspection once per shift.
	North Cable Vault	9	Electrical Core Monitor	Continuous Fire Watch (Note 1)
	South Cable Vault	10	Electrical Core Monitor	Continuous Fire Watch (Note 1)
	1st Floor Aux. Bldg. Corridor	12	Electrical	Continuous Fire Watch (Note 2)
	1st Floor Aux. Bldg. Corridor North	11	Electrical	Hourly Fire Watch (Note 2)
	1st Floor Aux. Bldg. Corridor South	13	Electrical	Hourly Fire Watch (Note 2)
	CCW Room	5	Support Core Cooling	Hourly Fire Watch (Note 2)
	E1-E2 Room	20	Electrical	Continuous Fire Watch (Note 3)

Cable Spread  
Room

19

Electrical

Continuous  
Fire Watch  
(Note 3)

- NOTE 1: One continuous Fire Watch will cover both Zones 9 and 10 (Sketch A). Zones 9 and 10 are adjoining rooms with connecting fire doors. One fire door will be blocked open allowing the Fire Watch to visually monitor both rooms simultaneously. This will provide adequate capability for early fire detection and Control Room notification.
- NOTE 2: The continuous Fire Watch for Zone 12 will also provide the hourly inspection for Zones 5, 11, and 13 which will mean leaving Zone 12 for a maximum of 5 minutes. Zone 12 has no physical barriers between it and Zones 11 and 13. All three are actually the same Appendix R fire area. This will allow the Zone 12 continuous watch to monitor Zones 11 and 13 on an hourly basis without leaving the fire area. In addition, by opening Fire Door 3, this fire watch can enter Zone 5, which is adjoining Zone 13, on an hourly basis. This plan will maintain adequate capability for early fire detection and Control Room notification for all four zones (Sketch A).
- NOTE 3: One continuous Fire Watch will cover both Zones 19 and 20 and will also monitor the temporary Fire Detection Alarm Panel installed in Zone 20. Zones 19 and 20 are adjoining rooms with a common connecting fire door (Sketch B). This will allow one Fire Watch to monitor both rooms frequently and will provide adequate capability for early fire detection and Control Room notification.

In addition to the work described above, Plant Modification 940, "Battery Charger Addition," is currently scheduled to begin on November 10 and will require removal of Fire Doors 11 and 12 (See Sketches B and D) in order to install a new battery charger in the room. It is expected that this work will take longer than the seven days allowed for an inoperable Fire Door addressed in Technical Specification 3.14.7.2(c). While the Fire Doors are inoperable, the compensatory action required by Technical Specifications 3.14.7.2(a) and 3.14.7.2(b) will be followed. With Fire Door 11 removed, the Halon suppression system of Protection Zone 20 (Sketch B) will be inoperable and compensatory action will be met per Technical Specification 3.14.6.2.

Exceeding the Action Statement of any of the above Technical Specifications would require that a 30-day Special Report be submitted identifying the reason the equipment was out of service, compensatory action taken, and the plans for restoring the equipment to operable status. The purpose of this letter is to provide such a report in advance. Carolina Power & Light Company will keep the NRC Resident Office informed of activities associated with the above projects while the equipment is out of service.

As currently planned, the Fire Protection System, where inoperable, will be returned to service prior to power operations following the outage. If there is a change to the current schedule, a supplement to this letter will be submitted.

If you have any questions please contact Mr. J. M. Curley.

Very truly yours,



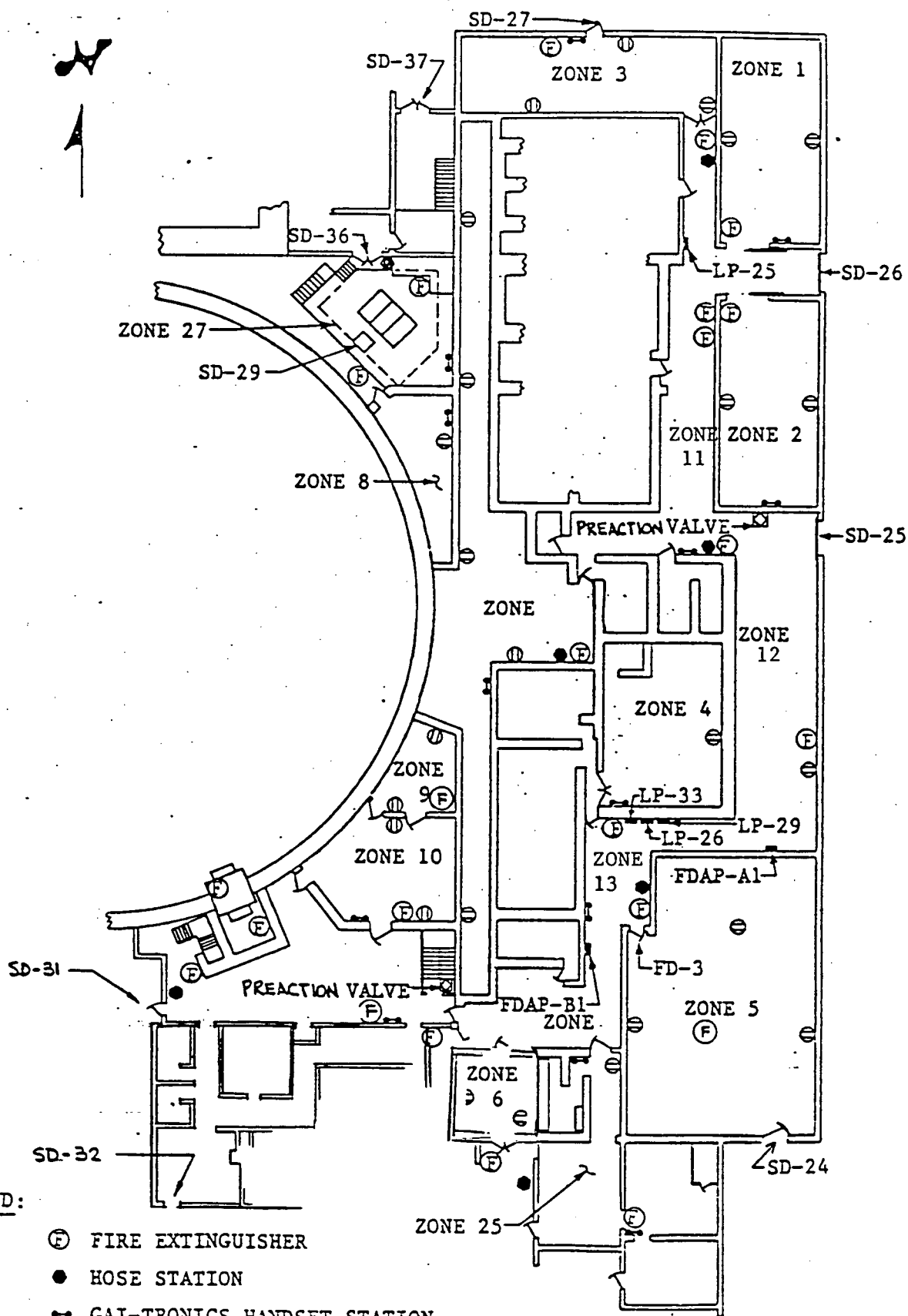
R. E. Morgan  
General Manager  
H. B. Robinson S. E. Plant

FLL:1ko

Enclosure

cc: Dr. J. N. Grace  
Mr. L. W. Garner  
INPO

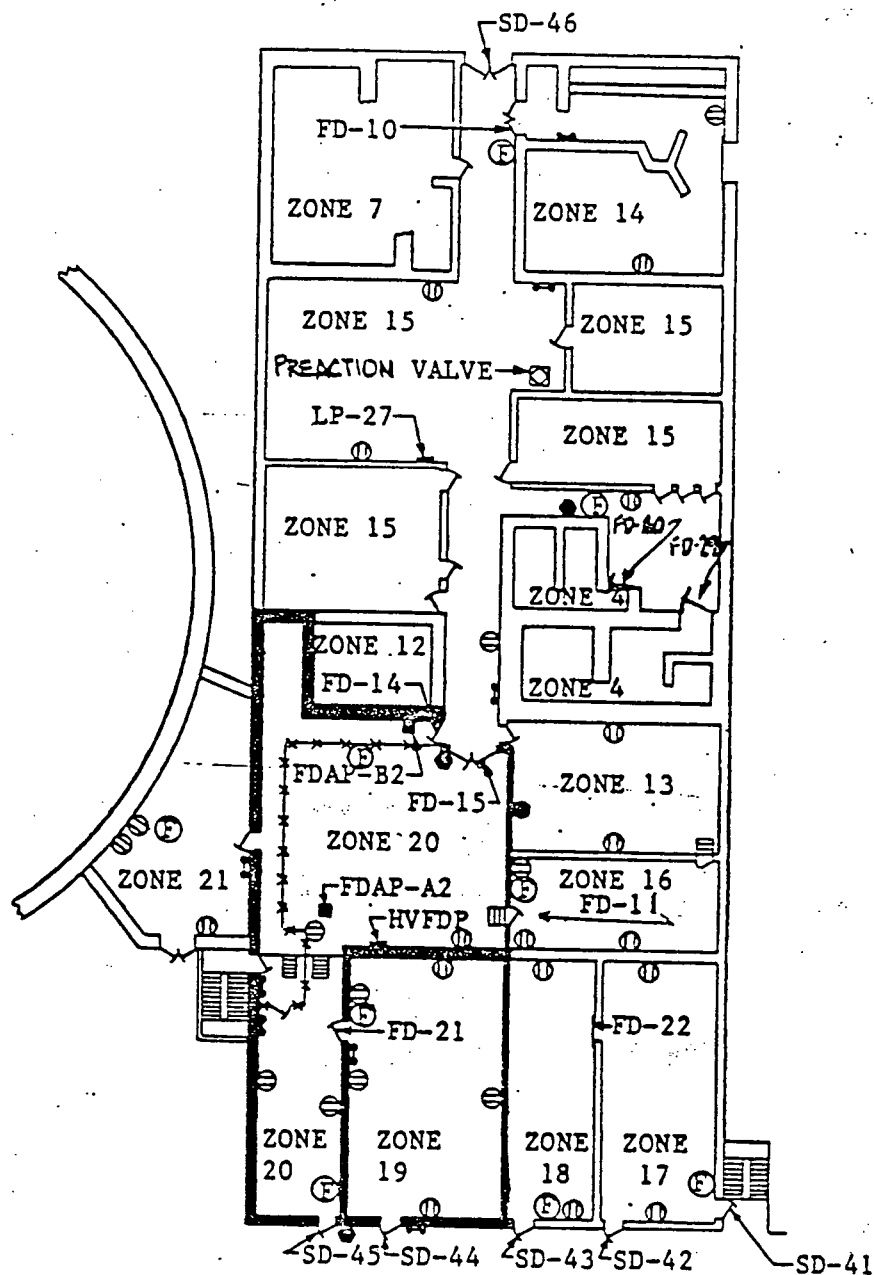
SKETCH A



LEGEND:

- ⊙ FIRE EXTINGUISHER
- HOSE STATION
- GAI-TRONICS HANDSET STATION
- ⊙ WALL RECEPTACLE

SKETCH B

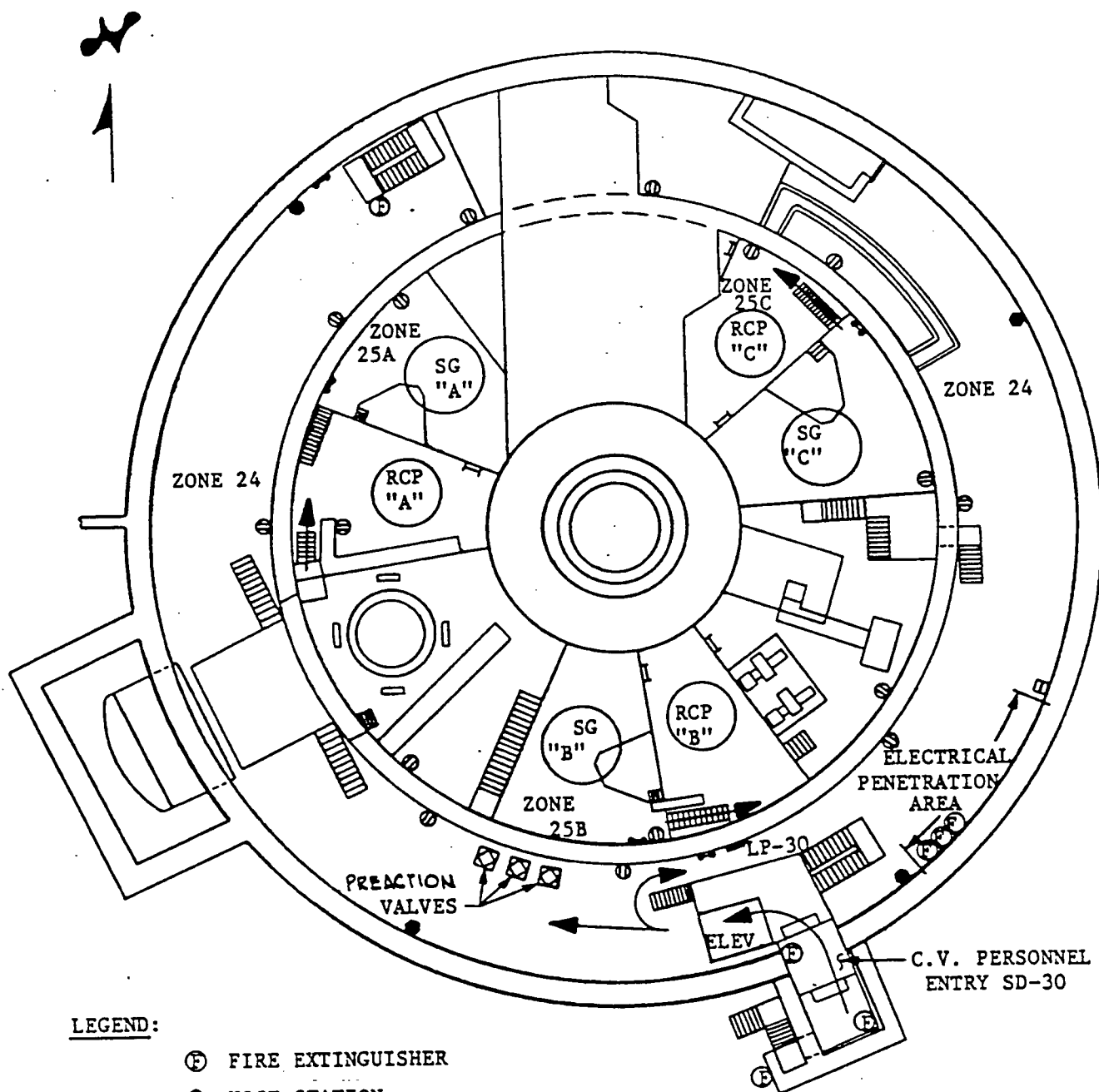


LEGEND:

- ⊕ FIRE EXTINGUISHER
- HOSE STATION
- ⚡ GAI-TRONICS HANDSET STATION
- Ⓜ WALL RECEPTACLE

SKETCH C

Fire Area "F"/Fire Zone 24 (Detection Zones 24, 25A, 25B and 25C) Containment

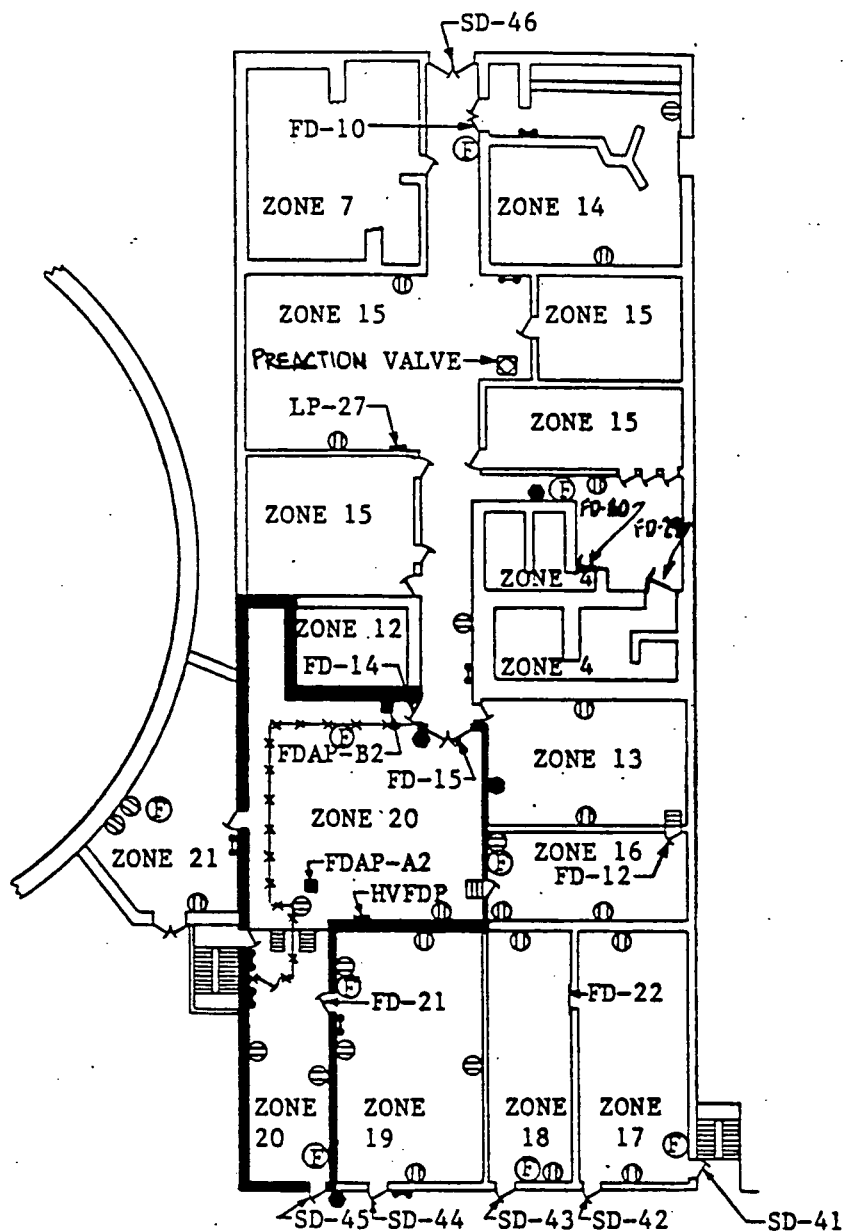


LEGEND:

- ⊕ FIRE EXTINGUISHER
- HOSE STATION
- ☎ GAI-TRONICS HANDSET STATION
- ⊞ MANUAL PULL STATION
- ⊙ WALL RECEPTACLE



SKETCH D



LEGEND:

- ⊕ FIRE EXTINGUISHER
- HOSE STATION
- GAI-TRONICS HANDSET STATION
- ⊙ WALL RECEPTACLE