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SUBJECT: Informs of apparent deviation re temporary radwaste handling facilities re fire protection.

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**Carolina Power & Light Company**

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET 50-261/LICENSE NO. DPR-23  
TEMPORARY RADWASTE HANDLING FACILITIES - FIRE PROTECTION

Dear Sir:

This letter is being provided to inform NRC of an apparent deviation from the intent of a previous commitment made by Carolina Power and Light Company (CP&L) at the H. B. Robinson Steam Electric Plant Unit 2 (HBR2) in the area of Fire Protection. This commitment was made in our correspondence to the Office of Nuclear Reactor Regulation (NRR), dated December 29, 1976, Serial: NG-76-1636, regarding our "Fire Protection Program Evaluation." The subject correspondence made certain commitments to provide for detection and suppression capability, as well as other features, to Fire Area No. 13, Solid Waste Handling Room (Drumming Room) to maintain a low probability of radioactive release from this area. These commitments were found acceptable, pending implementation, as satisfying the objectives of a fire protection program. (Reference Section 5.11 of NRC's Safety Evaluation supporting Amendment No. 31 of HBR's Operating License). These added features were provided as committed.

In preparation for the Steam Generator Replacement Outage, to facilitate certain solid radwaste handling activities, temporary facilities were constructed in 1984 outside the Drumming Room. Certain functions which had previously been in the Drumming Room were moved to the temporary facilities. Analyses were performed supporting construction of these facilities which addressed the potential for release of radioactive materials, however, these analyses did not address the potential for radioactive releases due to a fire. At the time the temporary facilities were established, positive controls did not exist that would have ensured appropriate Fire Protection Program reviews were conducted. As such, these buildings/facilities were constructed without fire detection, suppression capabilities, etc. CP&L believes these actions have deviated from the intent of our commitments to Appendix A of Branch Technical Position (BTP) APCSB 9.5-1, dated April 23, 1976.

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A safety evaluation was completed on May 16, 1988, to assess the consequences of a fire assuming that the fire would result in the release of 100% of all radioactive materials involved. This evaluation concluded that the whole body offsite dose from such a fire would be less than 1 millrem, therefore, the radiological consequences would be insignificant. This issue was addressed by the Plant Nuclear Safety Committee on May 18, 1988 and determined not to be a safety concern. A nonconformance report (NCR) was generated on June 9, 1988, NCR No. 88/085, to document this deviation.

Although fire detection and suppression systems are not available for the structures in question, adequate manual fire fighting equipment is available in close proximity to the area. This manual suppression consists of adequate fire hydrants and hose houses.

A Plant Improvement Request (PIR 86-313/01) has been submitted to relocate the radwaste handling functions to a permanent location with fire protection equipment meeting the intent of our original commitment regarding the Drumming Room. This location will be the recently constructed, currently vacant Radwaste Building. The move of the radwaste handling activities to the Radwaste Building is currently scheduled for completion in 1989.

For long-term corrective action, the site Industrial Engineering organization will conduct a review of controls of temporary facilities as they relate to this issue. The plan and schedule for long-term corrective actions regarding control of temporary facilities will be available by December 31, 1988.

Should you have further questions regarding these issues, please contact Mr. R. E. Morgan at 803-383-1201.

Yours very truly,



Charles R. Dietz  
Manager

Robinson Nuclear Project Department

DCS:jch

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