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 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400  
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 SMITH,S.H. Carolina Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 MURLEY,T.E. Office of Nuclear Reactor Regulation, Director (Post 870411

SUBJECT: Responds to NRC 881202 ltr concerning Generic Ltr 88-17 re  
 loss of DHR.

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SHERWOOD H. SMITH, JR.  
Chairman/President

December 21, 1988

Mr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington DC 20555

Dear Mr. Murley:

In response to your letter of December 2, 1988 concerning the Loss of Decay Heat Removal (Generic Letter 88-17), we wish to assure you that Carolina Power & Light Company is aggressively addressing this matter. We have already implemented many of the required actions in recent refueling outage activities.

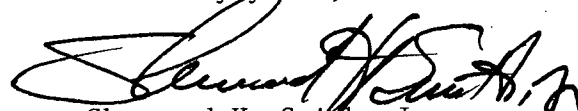
Our ongoing Operating Experience Feedback programs have kept us abreast of the significant loss of RHR events and their respective causes. These programs involve our independent On-Site Nuclear Safety organizations which review and evaluate NRC Information Notices and INPO SOERs. Through the efforts of multi-disciplinary task forces which have been established, actions have already been completed at both our H. B. Robinson (HBR2) and Shearon Harris (SHNPP) nuclear facilities. Based on Westinghouse Owners' Group (WOG) early notification guidance, SHNPP implemented many of the eventual actions of G.L.88-17 prior to the start of the first refueling outage on July 30, 1988 which was prior to the issuance of G.L.88-17. At HBR2 the sequence of the present refueling outage schedule was revised just prior to the start of the November 12, 1988 outage to eliminate mid-loop operations with fuel in the reactor vessel.

Further, CP&L has been an active participant in WOG programs to address this issue. Specifically, WOG has produced WCAP 11916 (Loss of RHRS Cooling While the RCS is Partially Filled), which is the event analysis, and is presently developing generic procedural guidance. Both plant and corporate office personnel attended the WOG sponsored workshop involving NRC and industry.

In summary, although our formal responses to the Generic Letter are due in January and February 1989, many actions consistent with the letter have already been taken. We are currently preparing our formal responses and long-term action plans, and my staff would be happy to discuss our program further following your evaluation of our responses.

8812280081 881221  
PDR ADOCK 05000261  
P PDC

Sincerely yours,



Sherwood H. Smith, Jr.

SHSjr/imj

cc: Attached

Accl  
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H. B. Robinson 2

cc:

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