

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8901240271 DOC. DATE: 89/01/19 NOTARIZED: NO DOCKET #
 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 LOFLIN, L.I. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Documents licensee understanding of safety evaluation re
 Unit 2 compliance w/ATWS Rule 10CFR50.62.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-1 LA	1 0	PD2-1 PD	2 2
	LO, R	1 1		
INTERNAL:	ARM/DAF/LFMB	1 0	NRR/DEST/ADS 7E	1 1
	NRR/DEST/CEB 8H	1 1	NRR/DEST/ESB 8D	1 1
	NRR/DEST/MTB 9H	1 1	NRR/DEST/RSB 8E	1 1
	NRR/DEST/SICB	1 1	NRR/DOEA/TSB 11	1 1
	NUDOCS-ABSTRACT	1 1	OGC/HDS1	1 0
	REG FILE 01	1 1	RES/DSIR/EIB	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 16

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S

0 m/A-4

CP&L**Carolina Power & Light Company**

JAN 19 1989

SERIAL: NLS-88-266
10CFR50.62

Company Correspondence

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
SAFETY EVALUATION FOR THE HBR2 AMSAC SYSTEM

REFERENCE: Safety Evaluation re: H. B. Robinson Steam Electric Plant, Unit 2
(HBR2), Compliance with the Anticipated Transient Without Scram
(ATWS) Rule 10 CFR 50.62 (Tac No. 64561), dated October 14, 1988

Gentlemen:

Carolina Power & Light (CP&L) has received and reviewed the subject safety evaluation in the above-listed reference. In order to ensure there is a clear understanding of our commitments regarding AMSAC design and testing and the staff's concurrence with those commitments, CP&L herein documents our understanding of the safety evaluation on three specific points. The clarifications that follow deal with statements from Item 12, "Testability at Power," in Section 3.0, "Evaluation and Discussion," of the safety evaluation. In order to facilitate presentation of the clarifications, the relevant text of the Safety Evaluation Report (SER) is quoted below followed by CP&L's clarifying remarks.

SER Statement

Section 3, Item 12 of the safety evaluation states: "The licensee stated that a complete end-to-end test of the AMSAC system, including the AMSAC outputs through the final actuation device, will be performed during each refueling outage. With the plant at power, the system can be tested with the AMSAC outputs bypassed. The testing capability will consist of a series of overlapping tests. These tests will verify analog channel accuracy and coincidence logic operation, including the operation and accuracy of all timers. In addition the self-monitoring and automatic check features of the microprocessors are always active, and the control room operators will be alerted automatically if any anomaly is detected."

"At power tests will be performed with the AMSAC outputs bypassed. This bypass will be accomplished through a permanently installed bypass switch which negates the need to lift leads, pull fuses, trip breakers, or physically block relays . . ."

Clarification

The discussion of AMSAC system testing capabilities is correct, however, it may lead one to believe that these overlapping tests, including analog channel accuracy, coincidence logic operation, and timer operation/accuracy will be performed at

8901240271 890119
PDR ADOCK 05000261
P FDC

A001
1/0

power. Carolina Power & Light committed to perform these overlapping end-to-end tests during refueling as provided in the staff's guidance associated with the rule. Due to the redundant design of the HBR2 AMSAC processor and the automatic self-test features, testing at a frequency greater than once per 18 months was not warranted or committed to. Analog input channel accuracy testing was committed to be performed as part of the current outage-based testing for the steam generator level instruments. Output actuation capability downstream of the bypass switch cannot be performed at power. Like the input loops, the actuation circuitry will be tested on a refueling basis as part of the existing Auxiliary Feedwater System circuits tests. Although the AMSAC processors have considerable at-power testing capabilities, the capabilities are viewed as troubleshooting tools which will come into play only if the system's extensive self-checking capabilities indicate a problem.

SER Statement

In the last paragraph of Section 12, the safety evaluation stated that "It is the staff's understanding that the licensee will conduct a human-factors review of the controls and indications used for testing purposes consistent with the plant's detailed control room design process."

Clarification

This statement is correct when read within the context of the commitments CP&L made regarding human factors reviews. Our October 30, 1987 Plant-Specific AMSAC Submittal limited discussion of human factors reviews to control room modifications. Some of the "indications" used for testing purposes are not in the control room and therefore are not subject to the formal human factors reviews specified by the Detail Control Room Design Review Summary Report.

SER Statement

Section 12 of the safety evaluation stated "Status outputs to the plant computer and main control board, indicating that a general warning condition exists with AMSAC, will be initiated when the system's outputs are bypassed."

Clarification

The above statement is correct in that bypass status indication will be in the control room, however, it is not provided to the plant computer. The only status output provided to the plant computer is for AMSAC "trip."

Please refer any questions regarding this submittal to Mr. R. W. Prunty at (919) 836-7318.

Yours very truly,



L. I. Loflin
Manager

Nuclear Licensing Section

LIL/MDM/lah (5841MDM)

cc: Mr. M. L. Ernst
Mr. R. Lo
Mr. L. Garner (NRC - HBR)