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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 AUTH. NAME AUTHOR AFFILIATION  
 UTLEY, E.E. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Application to amend License DPR-23, requesting blanket approval to transfer slightly contaminated sediment from settling ponds to facility ash ponds using either hydrovacuum truck or direct piping/sludging method.

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**CP&L**

**Carolina Power & Light Company**

P. O. Box 1551 • Raleigh, N. C. 27602

SERIAL: NLS-84-067

MAR 09 1984

E. E. UTLEY  
Executive Vice President  
Power Supply and Engineering & Construction

Director of Nuclear Reactor Regulation  
Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
DISPOSAL OF LICENSED MATERIAL  
REQUEST FOR APPROVAL

Dear Mr. Varga:

SUMMARY

On February 18, 1983 Carolina Power & Light Company (CP&L) was granted approval on a one-time basis to transfer slightly contaminated sediment from the H. B. Robinson Steam Electric Plant (HBR) settling ponds to the Unit 1 ash ponds using a hydrovacuum truck. Carolina Power & Light Company now requests blanket approval for transferring such sediments using either this previously approved method or a newly proposed direct piping/slucing method, the choice of which method would be made by CP&L at the time of each transfer. The safety analyses of both methods and relevant ash pond environmental radiation monitoring data are included with this letter for your review and approval.

BACKGROUND

By letter dated January 17, 1983, in accordance with 10 CFR 20.302, CP&L requested blanket approval of a proposed disposal procedure for slightly contaminated sediment from two settling ponds within the HBR2 restricted area. The NRC approved on a one-time basis the transfer by hydrovacuum truck of sediment containing Co-60 concentrations of less than  $3.0 \times 10^{-5}$  Ci/gm wet to the adjacent fossil plant ash pond on February 18, 1983. However, CP&L's request for blanket approval of future transfers was withheld pending NRC's receipt and review of HBR2 ash pond environmental radiation monitoring data.

DISCUSSION

Carolina Power & Light Company is hereby requesting blanket approval of the transfer of contaminated sediment using either the previously approved hydrovacuum truck method or a newly proposed direct piping/slucing method. The choice of which transfer method to be used would be made by CP&L at the

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time of each future transfer. The safety analysis for each of these two methods is provided in Attachments 1 and 2, respectively. (The information in Attachment 1 was previously submitted with our January 17, 1983 letter; it is being included in this submittal for completeness.) The safety analysis for the direct piping/sluicing method concludes that radiological impacts are minimal and compare favorably with the approved hydrovacuum truck method.

The ash pond surveillance data previously requested in your letter of February 18, 1983 is provided in Attachment 3. Initiated in February 1981, the sampling was conducted at a location in the ash pond where contaminated sediments had been added to the pond in the past. Consequently, the data have the greatest likelihood of representing the highest concentrations of Co-60 to be found in the pond and not the average concentrations for the pond. It is important to note that naturally occurring radionuclides are not included in the attached listing.

#### CONCLUSION

The results of the safety analyses for the hydrovacuum truck method and the direct piping/sluicing method compare favorably. Radiological impacts, as shown in the safety analyses and the ash pond environmental radiation monitoring data, are expected to be minimal. Therefore, CP&L requests that you review and provide blanket approval by June 1, 1984 for any future transfer of sediment, containing Co-60 in average concentrations not to exceed  $3.0 \text{ E-5 } \mu\text{Ci/gm wet}$ , from the settling ponds to the ash pond using either of the above disposal methods. In accordance with 10 CFR 170.22, a check in the amount of four thousand dollars (\$4,000.00) in payment of a single Class III Amendment is attached.

If you have any questions, please contact a member of our Nuclear Licensing staff.

Yours very truly,




E. E. Utley

CGL/ccc (9496NLU)  
Attachments

cc: Mr. W. P. Gammill (NRC)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. G. Requa (NRC)  
Mr. Steve Weise (NRC-HBR)

E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

  
Notary (Seal)

My commission expires:

My Commission Expires 6-8-86

ATTACHMENT 1