

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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

SUBJECT: Requests exemption from 10CFR50, App R, Section III.J  
 requirement to provide 8 h battery powered emergency  
 lighting for access & egress alternate access path to safe  
 shutdown equipment. Technical justification encl. Fee paid.

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check \$150 =  
 #449668



Carolina Power & Light Company

JAN 16 1985

SERIAL: NLS-84-457

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  
APPENDIX R - EXEMPTION REQUEST


Dear Mr. Varga:

Pursuant to 10 CFR 50.12, Carolina Power & Light Company (CP&L) hereby requests an exemption from the requirements of 10 CFR 50, Appendix R, Section III.J. The Company is requesting an exemption from having to provide 8-hour battery powered emergency lighting for access and egress an alternate access path to safe shutdown equipment. This exemption request is similar to the request discussed with your staff and submitted to the NRC in a letter dated June 29, 1984 (Mr. A. B. Cutter to Mr. S. A. Varga, Serial No. NLS-84-266).

Attachment 1 to this letter provides the technical justification for the exemption request and the technical information required by the NRC staff. The Company respectfully submits that the enclosed exemption will not endanger life or property or common defense and security and, is otherwise in the public interest. Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that an exemption application fee is required. A check for \$150 is enclosed in payment of this fee.

Should you have any questions concerning this letter, please contact Mr. Sherwood Zimmerman at (919) 836-6242.

Yours very truly,

  
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

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PDR ADDCK 05000261  
F PDR

PPC/ccc (784PPC)

Enclosures

cc: Mr. J. P. O'Reilly (NRC-RII)  
Mr. G. Requa (NRC)  
NRC Resident Inspector (RNP)

*w/ check \$150.00*  
*#449668*  
*A006*  
*1/1*

ATTACHMENT 1

10 CFR 50, Appendix R, Section III.J

Exemption Request Technical Justification

The safe shutdown analysis at H. B. Robinson, Unit 2 has identified the location of the safe shutdown equipment required for Appendix R. The access paths to each piece of equipment have also been identified. Emergency lighting will be provided in accordance with 10 CFR 50, Appendix R, Section III.J at the equipment location and the primary access path thereto.

H. B. Robinson, Unit 2 has identified situations where a fire may necessitate the local operation of a specific piece of equipment. This same fire would also block the primary access path to this safe shutdown equipment. These situations are:

- (1) A fire in the south end of the Auxiliary Building hallway ground level which would prevent access to the dedicated shutdown equipment in the Charging Pump Room;
- (2) A fire in the south end of the Auxiliary Building hallway ground level which would prevent access to the dedicated shutdown equipment in the Component Cooling Water Heat Exchanger Room;
- (3) A fire in the Emergency Switchgear Room which prevents access to the DC distribution panels in the Battery Room;
- (4) A fire in the north end of the Auxiliary Building hallway ground level which would prevent access to SI-864A and SI-864B in the Safety Injection Pump Room; and

In each case H. B. Robinson, Unit 2 has identified an alternate access path to the required equipment or alternate equipment which would provide the same function. The alternate access paths are:

- (1) Access to the Charging Pump Room from the second level of the Auxiliary Building adjacent to the non-regenerative and seal water heat exchangers;
- (2) Access to the Component Cooling Water Heat Exchanger Room from the Turbine Building via the exterior door in the south wall of the room;
- (3) Access to the Battery Room via the Chemical Batch Addition Room;
- (4) Access to the Safety Injection Pump Room from the north yard area; and

H. B. Robinson, Unit 2 will perform the necessary modifications to ensure access and will upgrade the emergency lighting for the alternate access routes to the Charging Pump Room, Component Cooling Water Heat Exchanger Room, and Battery Room (items 1, 2, and 3 above).

A fire in the north end of the Auxiliary Building hallway ground level would prevent access to SI-864A and SI-864B in the Safety Injection Pump Room. Operation of these valves is only necessary if the above fire causes the spurious operation of a RWST drain path.

H. B. Robinson, Unit 2 proposes to use dedicated portable emergency lighting whenever the alternate access path to the Safety Injection Room is used. The alternate access path follows the exterior of the Auxiliary Building along the east and north sides to the Safety Injection Pump Room exterior door. Portable hand-held lighting will provide the operator in transit with adequate illumination to gain access to the Safety Injection Pump Room. Permanent, emergency lighting is provided inside the Safety Injection Pump Room to operate the required equipment.

Pursuant to the requirements of 10 CFR 50.12, CP&L requests an exemption from the requirements of 10 CFR 50, Appendix R, Section III.J to provide emergency lighting on the exterior of the Auxiliary Building along the alternate path to the Safety Injection Pump Room. H. B. Robinson, Unit 2 believes that providing dedicated portable emergency lighting is technically equivalent to the requirements of Section III.J. for this application for the following reasons:

- (1) This is an alternate access path that would only be used if the primary access path is obstructed by a fire in the north end of the Auxiliary Building hallway, ground level.
- (2) The alternate access path is completely external to the building and does not pass through any congested areas.
- (3) Access to the Safety Injection Pump Room will only be required to shut the Refueling Water Storage Tank (RWST) outlet valves SI-864A or SI-864B. Operation of these valves is only necessary if the above fire causes the spurious operation of a RWST drain path.

Based on this, CP&L believes that dedicated portable lighting would be as effective as verbatim compliance with the requirements of 10 CFR 50, Appendix R, Section III.J to provide permanent emergency lighting along the alternate equipment access paths to the Safety Injection Pump Room.