

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8511040152 DOC. DATE: 85/10/28 NOTARIZED: NO DOCKET #
 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co. 05000261
 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S.R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Amends 850213 request for exemption from requirements of
 10CFR50, App R, Section III.G.3 detection & fixed suppression
 requirements for three fire areas using alternate shutdown
 capability.

DISTRIBUTION CODE: A006D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
 TITLE: OR Submittal: Fire Protection

NOTES: 05000261
 OL: 07/31/70

RECIPIENT		COPIES		RECIPIENT		COPIES	
ID	CODE/NAME	LTTR	ENCL	ID	CODE/NAME	LTTR	ENCL
NRR	ORB1 BC 01	3	3				
INTERNAL:	ACRS 11	3	3	ADM/LFMB		1	0
	ELD/HDS1	1	0	IE WHITNEY, L		1	1
	NRR STANG, J 07	2	2	NRR WERMEIL, J06		1	0
	NRR/DE/CEB 09	2	2	NRR/DL DIR		1	1
	REG FILE 04	1	1	RGN2		1	1
EXTERNAL:	24X	1	1	LPDR 03		1	1
	NRC PDR 02	1	1	NSIC 05		1	1



Carolina Power & Light Company

OCT 28 1985

SERIAL: NLS-85-351

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 - AMENDED EXEMPTION REQUEST

Dear Mr. Varga:

INTRODUCTION

Pursuant to 10 CFR 50.12, Carolina Power & Light Company (CP&L) hereby amends our previously submitted request for a technical exemption from the requirements of 10 CFR 50, Appendix R, Section III.G.3. This exemption is from the III.G.3 detection and fixed suppression requirements for three fire areas.

BACKGROUND

In a letter dated February 13, 1985 (Mr. A. B. Cutter to Mr. S. A. Varga, Serial No. NLS-85-026), CP&L requested an exemption for three fire areas where credit was taken for Alternate Shutdown Capability (III.G.3) in the H. B. Robinson safe shutdown scenario. In the process of our effort to finalize documentation of Appendix R compliance for H. B. Robinson, the component cooling surge tank was identified as a component not discussed in our previous submittal. Attachment 1 to this letter provides revised pages in the format of our February 13, 1985 exemption request to address this component. Revisions to the previous submittal are indicated by a vertical line in the margin.

CONCLUSION


The Company hereby amends our previously submitted exemption request for three fire areas which utilize an Alternate Shutdown Capability. Carolina Power & Light Company respectfully submits that this amendment does not alter the conclusion of the existing exemption request, namely, that this amended exemption request will not endanger life or property or the common defense and security, and is otherwise in the public interest. The exemption application fee was enclosed with the February 13, 1985 submittal.

8511040152 851028
PDR ADOCK 05000261
F PDR

Adock
1/1

Should you have any questions concerning this letter, please contact Mr. Patrick P. Carier at (919) 836-8165.

Yours very truly,



S. R. Zimmerman
Manager

Nuclear Licensing Section

PPC/crs (1967PPC)

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

ATTACHMENT 1

10 CFR 50, APPENDIX R, SECTION III.G.3

EXEMPTION REQUEST TECHNICAL JUSTIFICATION

(Amendment 1)

TABLE 2 (Continued)

Summary of Fire Areas/Zones Not Meeting Detection/Suppression Requirements

<u>Fire Zone</u>	<u>Combustible Loading (Btu/ft²)</u>	<u>Equivalent Fire Severity (min.)</u>	<u>Fire Detection (Note 1)</u>	<u>Fixed Fire Suppression</u>	<u>Manual Fire Suppression (Note 2 & 4)</u>
Area A/ Zone 18	32,000	24	2-HD 2-ISD 2-MPS	None	1-ABC 1-CO ₂ 1-H 1-HS 1-WH
Area A/ Zone 21	14,000	10	3-HD 3-ISD 1-MPS	None	1-H 1-HS
Area A/ Zone 23	31,600	24	2-HD 2-ISD 1-MPS	None	3-H 2-HS 1-ABC
Area B/ Zone 4	18,500	13	2-HD 2-ISD 1-MPS	None	1-ABC 1-H 2-HS 1-WH
Area G/ Zone 25 (Note 3)	N/A	N/A	5-HD 5-ISD 1-MPS Deluge System	Deluge System (partial)	11-ABC 3-WH 1-CO ₂ 4-H 1-H-WC 15-HS 3-YH

Area G/ Zone 30	Negligible	Negligible	None	None	1-ABC 1-CO ₂ 4-HS 1-YH
Area G/ Zone 30	N/A	N/A	Security	None	1-WH 1-YH
Area G/ Zone 31	Negligible	Negligible	Security	None	1-YH
Area G/ Zone 32	Negligible	Negligible	Security	None	1-YH
Area G/ Zone 33	Negligible	Negligible	Security	None	1-YH

3. Safe Shutdown Equipment

- a. The designated alternative shutdown method for Area A is Alternative Train A. The fire zones under consideration within Area A which contain Train A safety components are discussed below.

Fire Zone 3 - SI Pump Room

This fire zone contains RWST outlet valves SI-864A and SI-864B. These valves must be closed for safe shutdown. However, analysis has demonstrated that 70 minutes are available to close these valves in the event of a fire. The equivalent fire severity in this zone is approximately 23 minutes, therefore, ample time exists to extinguish the fire and gain access to these valves for manual operation.

Fire Zone 11 - Pipe Alley

The fire zone contains component cooling water supply and return valves FCV-626 and CC-716 A and CC-716 B in the flow path to and from the reactor coolant pump thermal barriers. This zone also contains RCP seal water return valve CVC-381. It is necessary to establish either CCW flow or RCP seal water flow to maintain seal integrity. Seal water injection flow is independent of the above valves. The equivalent fire severity in this zone is 12 minutes, therefore, ample time exists to establish seal water injection, extinguish the fire, and gain access to these valves to provide additional assurance of RCP seal integrity.

Fire Zone 12 - Waste Holdup Tank, RHR Heat Exchangers

This fire zone contains the two RHR heat exchangers, one of which is necessary for plant cooldown. Due to the negligible combustible loading in this zone and the passive nature of the metal, the water-filled heat exchangers will remain free of fire damage and will be available for cooldown in the event of a fire in this zone.

Fire Zone 16 - Battery Room

The fire zone contains power feed to Auxiliary Panels DC and GC. these panels should be de-energized to properly position safe shutdown valves. However, the valves can be placed in their proper position by using the control switches in the Control Room.

Fire Zone 23 - Hagan Room

This fire zone contains the Component Cooling surge tank on the upper level (elevation 267' 0"). The combustible material in this zone consists of cable insulation and paper located in the Hagan Room at elevation 254' 0". Combustible material in the surge tank room itself is negligible. Due to the low combustible loading (approximately 24 minutes equivalent fire severity), the separation of the rooms within the zone, and the passive nature of the metal surge tank, this water-filled tank will remain free of fire damage and available to support safe shutdown in the event of a fire in this zone.

For the remaining fire zones in Area A, Alternative Train A is independent of each zone and available for safe shutdown.