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SUBJECT: Provides addl info re util 900730 request for exemption from
 10CFR50, App R re component cooling water pump room.

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Carolina Power & Light Company

SERIAL: NLS-90-166

AUG 16 1990

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
ADDITIONAL INFORMATION REGARDING COMPONENT COOLING
WATER (CCW) PUMP ROOM EXEMPTION

Gentlemen:

Carolina Power & Light Company's (CP&L) letter dated July 30, 1990 requested an exemption from 10CFR50 Appendix R regarding the combustible loading provided by additional cabling to be run through the CCW Pump Room at H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). This letter provides additional information regarding the basis for the request.

The exemption is requested pursuant to 50.12(a)(2)(ii) in that application of the regulation in this particular circumstance is not necessary to achieve the underlying purpose of the rule. The proposed additional cabling to be added in the CCW Pump Room results from implementation of a modification in response to NUREG-0737 Item III.D.3.4, Control Room Habitability, and potential future plant modifications. Access through the CCW pump room is the only feasible option due to existing penetrations to the cable spread room. The alternative to the proposed exemption would be routing of the cables in conduit (determined to be impractical due to space limitations) or extensive wrapping and re-wrapping of the cable trays to meet the current combustible loading limits (caused by any work being performed on the cable trays as a result of subsequent modifications). The cost and scheduling impact of this latter option would be significant. On the other hand, the substantial fire protection measures described in our July 30, 1990 letter provide assurance that the configuration will not present an undue risk to the public health and safety pursuant to 10CFR50.12(a)(1), and literal compliance would not appreciably enhance the fire protection capability.

Regarding potential environmental effects, the proposed exemption will provide a degree of fire protection that is consistent with that required by Appendix R for other areas of the plant such that there is no significant increase in the risk of fires at the facility. Consequently, the probability of fires has not been increased. Likewise, the post-accident radiological releases will not be greater than previously determined, nor does the proposed exemption otherwise affect plant radiological effluents. Therefore, CP&L believes that there are no significant radiological environmental impacts associated with this proposed exemption.

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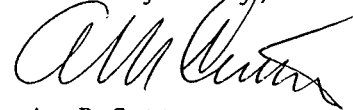
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With regard to potential non-radiological impacts, the proposed exemption involves features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect non-radiological plant effluents and has no other environmental impact. Therefore, CP&L believes that there are no significant non-radiological environmental impacts associated with the proposed exemption.

Questions regarding this matter may be referred to Mr. L. I. Loflin at (919) 546-6242.

Yours very truly,



A. B. Cutter
Vice President

Director - Special Nuclear Projects

JSK/ecc (785RNP)

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