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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  
 EISENHUT, D. G. Division of Licensing

SUBJECT: Responds to NRC 800507 generic ltr re second set of TMI-related requirements for operating reactors. Licensee can meet all requirements except Item I.A.1.3, shift manning, for which 30-day extension is requested.

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Carolina Power & Light Company

June 11, 1980

File: NG-3514(R)

Serial No.: NO-80-899

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555

H. B. ROBINSON UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
FIVE ADDITIONAL TMI-2 RELATED REQUIREMENTS  
TO OPERATING REACTORS

Dear Mr. Eisenhut:

On May 7, 1980, you transmitted a letter to all operating reactor licensees regarding a second set of TMI-related requirements for operating reactors resulting from Commission approval of the Near-Term Operating License requirements of the TMI Action Plan. Carolina Power & Light Company's (CP&L) response to the actions set forth in your letter is addressed below and is applicable to the H. B. Robinson Unit No. 2 plant.

Your letter requested that CP&L state its commitment to meet each of the requirements set forth in the attachments to your letter and to meet the associated schedules for each requirement. We have reviewed the information attached to your letter, and find we can comply with your request with the exception of Item I.A.1.3, Shift Manning. You indicated that the requirements for this item would be provided through separate correspondence. Therefore, we request that response to this item be deferred until 30 days following the receipt of that correspondence to allow us an appropriate period to study the requirements requested in this area.

With regard to Item I.A.3.1, Revise Scope and Criteria for Licensing Examinations, we have received Mr. Denton's letter of March 28, 1980 forwarding the revised criteria that can be implemented under current regulations. We have reviewed the criteria and the implementation dates set forth in Paragraphs A, B, and C of Enclosure 1 to Mr. Denton's letter and intend to meet these criteria and the implementation dates. We are continuing our review of the long range requirements and will defer any commitment until such time as they become firm requirements.

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With respect to Item I.C.5., Procedures for Feedback of Operating Experience to Plant Staff, and Item III.D.3.4, Control Room Habitability, we do not presently foresee any problem in meeting the implementation dates set forth in Enclosure 1 to your May 7 letter, and hereby commit to meet the requirements and the implementation dates.

With regard to Item II.K.3, we have determined that there are 13 of the 28 subitems that are potentially applicable to H. B. Robinson. Of these 13, we have determined that one of the items, Item II.K.3.10, Anticipatory Trip Modification, is not applicable to the H. B. Robinson Plant due to its design. We also understand that Item II.K.3.25, Effect of Loss of AC Power on Pump Seals, Item II.K.3.29, Study to Demonstrate Performance of Isolation Condensers with Non-Condensibles, and Item II.K.3.44, Anticipated Transients with Single Failure to Verify No Fuel Failure, are issues related to Boiling Water Reactors rather than Pressurized Water Reactors, and are erroneously indicated as being applicable to plants such as H. B. Robinson.

With regard to Item II.K.3.30, Revise Small Break LOCA Methods to Show Compliance with 10CFR50, Appendix K, CP&L does not believe that it would be appropriate for our fuel vendor (Exxon Nuclear Company) to submit revised small break LOCA methods for H. B. Robinson Unit No. 2. Previous analysis by our reactor vendor, Westinghouse, has shown that the small break LOCA is definitely non-limiting from the point of view of the fuel, and therefore, that core thermal power limits--the sole LOCA analysis area in which our fuel vendor has been involved--are completely defined by the large break LOCA. Further, it is well known that fuel characteristics are of very secondary importance in determining the plant response to a small break LOCA; the most important parameters being the licensed core power level, the performance characteristics of the ECCS, the normal primary coolant loop operating temperature, and the elevation of the core with respect to the hot and cold legs. In the unlikely circumstance that small break LOCA should become limiting, either due to the discovery of previously unknown phenomena or as a result of additional licensing conservatisms, it would of course then become necessary for our fuel vendor to provide suitable documentation for its methods.

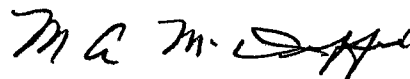
With regard to Item II.K.3.31, Plant Specific Calculations to Show Compliance with 10CFR50.46, it is our belief that small break LOCA is not a limiting event from the point of view of the fuel. Therefore, we do not believe it is necessary to perform plant specific calculations of the type requested for H. B. Robinson Plant.

Accordingly, we believe the following seven items are applicable to H. B. Robinson for implementation: II.K.3.1, II.K.3.2, II.K.3.3, II.K.3.5, II.K.3.9, II.K.3.12, and II.K.3.17. It is CP&L's intent to meet the requirements set forth in Enclosure 3 to your letter and the implementation schedule set forth in Enclosure 1.

We believe that a number of the items required by your letter may require further definition of the requirements and acceptance criteria through discussions with NRC Staff. If this should cause a change in scope of the items that could impact the implementation schedule for H. B. Robinson, we will inform you promptly so that any problems associated with implementation may be resolved to our mutual agreement. As part of these discussions, and following a comprehensive review of the requirements, CP&L may wish to propose alternatives to the strict interpretation of some requirements. Such alternatives may include: a) modifications other than those suggested by the requirement which are of equal or greater safety improvement; b) design and test of hardware modifications on a single typical plant followed by implementation on remaining plants; c) exception to some requirements whose implementation is believed unnecessary. Additionally, implementation of plant modifications may be dependent on availability of equipment and purchasing lead time. It is our intent to work on the study, design, engineering, procurement, and construction of these items in a manner that will reduce or eliminate these concerns; however, if equipment availability becomes a problem that will unavoidably delay implementation of any requirement, we intend to petition for relief of the implementation schedule. Finally, you should realize that these additional requirements, many of which have the same implementation dates as the Short Term Lessons Learned Requirements we are currently working on, will place an additional strain on CP&L's and the industry's already limited resources. We hope that this is recognized by you and the remainder of the NRC Staff, and that you will work with us where necessary to ensure that correct implementation of the requirements are made only to increase the overall safety of the H. B. Robinson Unit No. 2 plant.

We trust this letter is responsive to your requirements at this time, and stand prepared to provide additional information if you so desire.

Yours very truly,



for E. E. Utley  
Executive Vice President  
Power Supply and  
Engineering & Construction

DBW/JJS/jc (0562)

cc: Mr. J. D. Neighbors (NRC)