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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Responds to NRC 800602 request to modify administrative procedures to limit auxiliary feedwater flow. Util will revise procedures to limit pump operation following postulated steam line break & prior to isolating component.

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Carolina Power & Light Company

July 9, 1980

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Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
United States Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
LIMITING AUXILIARY FEEDWATER FLOW

Dear Mr. Varga:

In response to your request dated June 2, 1980 to modify Administrative Procedures at H. B. Robinson Unit No. 2 (HBR) to limit auxiliary feedwater (AFW) flow to 400 gpm per steam generator (S/G) following a postulated steam line break (one which is unisolable and results in automatic or manual initiation of safeguards) we offer the following:

Currently, the AFW system at HBR possesses no means of monitoring AFW flow rate to any significant accuracy. The monitoring system installed as required by NUREG-0578 provides a reliable qualitative means of determining flow to the S/G's but was not intended to provide precise quantitative information. Additionally, the AFW system contains no capability for remote flow control since the motor-operated valves to the S/G's are either fully opened or fully closed following operation. Therefore, the only feasible method of restricting the maximum flow rate to a S/G is by assuming a nominal flow capacity for each pump and controlling the number of AFW pumps operating.

In the event of a postulated steam line break, both motor-driven AFW pumps (2) will automatically start and their associated valves (5) will fully open as a result of the consequent safety injection (SI) signal. In the event that, concurrent with the postulated steam line break, two of the three S/G's experienced a low low-level condition (15% of narrow range span) or a loss of voltage to 4KV busses 1 and 4 (power supply for A and B main feed pumps), the steam-driven AFW pump would start and its associated valves would fully open. Current system logic prevents stopping the steam-driven AFW pump until the initiating conditions are corrected (S/G level regained, power regained to either 4KV buss 1 or 4). However, the motor-driven pumps may be stopped under this condition.

Therefore, Carolina Power & Light Company intends to modify its procedures at HBR. The revised procedures will direct the control operator, following a postulated steam line break and prior to isolating the affected

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S/G, to insure that no more than the one steam-driven pump or the two motor-driven pumps are operating. This would result in a total nominal capacity of 600 gpm to the two operating S/G's. To fully implement these changes, modifications may be required to the current system logic and details of these changes are still being considered. Consideration of these changes will be completed by August 1, 1980 and, if necessary, hardware changes will be made as soon as practicable pending availability of required materials. If no modifications are found to be necessary, the procedure changes will be fully implemented prior to startup after the 1980 refueling outage.

Carolina Power & Light Company believes that these administrative controls will address the concerns by minimizing the exposure of the S/G's to AFW system flow rates greater than 400 gpm.

If you have any questions regarding this matter, please contact my staff.

Yours very truly,



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

JHE/dk

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