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

SUBJECT: Discusses commitments made as result of 801015 meeting w/
 NRC re followup steam generator insp. Info re steam generator
 chemistry control & improvements implemented will be
 provided within 30 days.

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Carolina Power & Light Company

October 22, 1980

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Office of Nuclear Reactor Regulation
Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
U. S. Nuclear Regulatory Commission
Washington, C. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSES NO. DPR-23
STEAM GENERATOR INSPECTION-FOLLOWUP

Dear Mr. Varga:

At the request of your staff, Carolina Power & Light Company representatives met with them on October 15, 1980 to discuss further followup regarding the recent inspection of the H. B. Robinson steam generators (S/G). As a result of that meeting, a number of commitments were requested by your staff. Accordingly, Carolina Power & Light Company is prepared to make the following commitments:

1. A S/G eddy current (E/C) inspection will be performed prior to exceeding six (6) effective full power months of operation during the upcoming cycle. This inspection will utilize the same general inspection techniques employed during the recent August-September inspection in order to substantiate previously calculated corrosion rates presented in our October 6, 1980 report. A report detailing the scope of the above inspection will be submitted for review by your staff at least 45 days prior to the scheduled inspection.

Additionally, Carolina Power & Light Company concurs with the request of your staff to have an NRC consultant and/or a member of your staff on site during the inspection for the purpose of reviewing inspection techniques and data results.

2. In addition to the primary-to-secondary leakage rate criteria addressed in the plant Technical Specifications, the following additional criteria will apply until the above inspection has been performed. Specifically, appropriate corrective actions will be taken if the verified primary-to-secondary leakage in any one S/G exceeds any of the following:
 - a. A sudden step increase of 0.1 gallon per minute leakage if the total leakage rate in that S/G exceeds 0.2 gpm.
 - b. An upward trend in leakage rate in excess of 0.02 gpm per day if leakage rate in that S/G exceeds 0.2 gpm.

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This trend will be established using at least five valid consecutive daily samples. For the purpose of these and other leak rate determinations for the above, a "valid" sample will be considered one which was collected with the plant at equilibrium conditions such that the sample represents actual S/G conditions.

The 0.2 gpm threshold is based on the minimum leakage rate at which trends or step changes can be confidently measured. Specifically, H. B. Robinson - Reactor Coolant System (RCS) coolant activity is relatively low during power operation as a result of exceptional fuel clad integrity. This necessitates using a tritium activity comparison between the feedwater and reactor coolant to calculate primary-to-secondary leakage. This comparison involves the use of mass volume correlations and is very susceptible to such factors as feedwater makeup, RCS dilution, etc. As a result, lower levels of calculated leakage rate may not represent actual conditions. As the actual leakage rate increases to 0.2 gpm, I-131 becomes less difficult to detect in the S/G and this isotope is used in an alternative calculation to the less reliable tritium. Therefore, the identification of the step increase or upward trend is more confidently accomplished above this threshold. The rate of upward trend (0.02 gpm per day) likewise is based on the ability to confidently measure the parameter.

In addition to discussing the above commitments, it was agreed that in the event that reactor shutdown was required due to the above leakage rate criteria, S/G inspection plans during shutdown would be discussed with your staff at that time.

A separate request was made for information related to S/G chemistry control and improvements implemented (including planned future improvements). This information will be provided in a separate response which will be submitted within 30 days.

It is believed that the above comments and information adequately address the concerns related in the October 15 meeting. If you have any questions regarding the above, please contact my staff.

Yours very truly,

M A M. D. Utley

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

JMC/dk

cc: J. D. Neighbors