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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
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SUBJECT: Confirms commitments re steam generator insp program & identifies objections to NRC proposed commitment that licensee will not resume operation after eddy current examinations until NRC that test review for acceptable.

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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

STEAM GENERATOR INSPECTION COMMITMENTS

Dear Mr. Varga:

In letters dated October 22, 1980 and November 3, 1980, Carolina Power & Light Company (CP&L) committed to a steam generator inspection program that was more restrictive than the requirements contained in the Technical Specifications. Since these letters were issued, my staff has been in communication with you concerning clarifications to these commitments as well as additional commitments desired by the NRC. The purpose of this letter is to confirm the commitments we have made to date and identify our objections to an NRC proposed commitment.

CP&L confirms our commitment to the following items:

1. Prior to exceeding six effective full power months from October 25, 1980, a steam generator tube eddy current inspection will be performed. This inspection will utilize the same general inspection techniques employed during the August-September 1980 inspection. A report detailing the scope of the above inspection will be submitted for review at least 45 days prior to the scheduled inspection.
2. In addition to the primary to secondary leakage rate criteria in the Technical Specifications, the following additional criteria will apply until the above inspection has been performed. Specifically, the plant will be shutdown if the verified primary to secondary leakage in any one steam generator exceeds any of the following:
  - a. A sudden increase of 0.1 gallon per minute (gpm) if the total leakage rate in that steam generator exceeds 0.2 gpm.

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- b. An upward trend in leakage rate in excess of 0.02 gpm per day if the leakage rate in that steam generator exceeds 0.2 gpm. This trend will be established using at least five valid consecutive daily samples.
3. Whenever the plant is shut down to repair a steam generator tube leak, an inspection will be performed as mutually agreed upon by the NRC Staff and CP&L.
4. The NRC Staff will be provided with a summary of the results of the eddy current examination performed under items 1 and 3 above.

In addition, your staff proposed the following commitment:

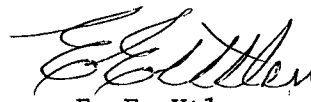
The licensee will not resume operation after the eddy current examinations required to be performed in accordance with conditions 1 or 3 until the Director, Office of Nuclear Reactor Regulation, determines in writing that the results of such tests are acceptable.

CP&L is of the opinion that this commitment is unnecessary, inappropriate, and unduly restrictive to plant operation and maintenance for the following reasons:

1. Although a similar commitment has been imposed on other plants experiencing steam generator tube degradation problems, H. B. Robinson does not fall into the same category of severity of problems as these other plants. The Point Beach unit situation is the closest to the situation at H. B. Robinson, but it is still significantly more severe. Point Beach is on a three-month inspection interval, has plugged 12 percent of the steam generator tubes, and has experienced an accelerated deterioration over the past year. H. B. Robinson, on the other hand, has recently committed to a six-month inspection interval, has plugged only 6.9 percent of the steam generator tubes, and has not experienced an increased degradation rate in other than the tube sheet region.
2. The commitments confirmed in this letter represent a significant and substantive tightening of the existing Technical Specifications. The additional proposed commitment to require written permission to startup only imposes bureaucratic constraints and delays, and does not add to the safety of the facility, the information provided to the NRC, or the ability of NRC or CP&L to evaluate continued safe operation.

3. The NRC has a resident inspector at H. B. Robinson who will be aware of the status of the steam generators during a shutdown for inspection or for a tube leak. Additionally, Office of Nuclear Reactor Regulation has asked to be notified of such shutdowns in order to send a representative to witness the tests and observe the results. If either of these inspectors differs with CP&L's opinion that it is safe to resume power operations, a mechanism already exists for preventing startup until a resolution is reached. However, CP&L is confident that this mechanism will not be needed, since it has been our policy to resolve NRC concerns before a decision is made to resume power operations. Therefore, the requirement for written NRC approval represents an unnecessary administrative delay which only serves to impose a financial burden on our consumers. We are particularly concerned about receiving written approval to start up over a weekend or a holiday period when the NRC personnel required to give approval are not readily accessible.
4. Our last objection is more generic in nature. Our operating license states CP&L is qualified to operate H. B. Robinson without unnecessary risk to the health and safety of the public. Any time H. B. Robinson is shut down in a planned or unplanned manner, CP&L makes a conscious and disciplined determination of whether the facility can be safely returned to power in accordance with our license. We have been making such decisions since our license was issued July 31, 1970. We do not consider the decision to return to power subsequent to a steam generator planned inspection or tube leak to be unique from the multitude of decisions made in the past. We consider the requirement for written approval to return to power to constitute an unjustified dilution of our operating license and to be totally without foundation in light of our history of cooperation with the NRC on this and other safety related issues. In light of your staff's continued attention to this issue, it may be appropriate for CP&L management representatives to meet with NRC management personnel to investigate the basis for this concern by your staff since we are not aware of any such action by CP&L that would warrant such concern over our operational performance. Please contact Mr. P. W. Howe at (919) 836-6816 if you feel the need to pursue such a meeting.

Yours very truly,



E. E. Utley

Executive Vice President  
Power Supply and  
Engineering & Construction