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SUBJECT: Forwards "Control Room Habitability Evaluation, HB Robinson
 Steam Electric Generating Plant (NRC TMI Action Plan Item
 III.D.3.4.)" *566 RPB*

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Carolina Power & Light Company

December 31, 1980

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Mr. Darrell G. Eisenhut, Director
Division of Licensing
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
CONTROL ROOM HABITABILITY REQUIREMENTS

Dear Mr. Eisenhut:

In accordance with the requirements of Item III.D.3.4, Control Room Habitability Requirements, as described in your letter of May 7, 1980 and the clarifications and schedule contained in NUREG-0737, Carolina Power & Light Company (CP&L) hereby submits for your review a report entitled "Control Room Habitability Evaluation H. B. Robinson Steam Electric Generating Plant". This report, prepared under contract by NUS Corporation for CP&L, responds to all of the information requested in the above-referenced NRC documents. The information in the report is presently undergoing a quality check, however, we do not expect the results and conclusions to change as a consequence of that verification. Any significant changes will be promptly brought to your attention.

In the course of our evaluation, no basic deficiencies were found with respect to the design requirements of the H. B. Robinson Unit No. 2 Final Safety Analysis Report (FSAR) for systems and equipment nor with other FSAR or Technical Specifications requirements for control room habitability. However, a few minor concerns with or possible areas of improvement in the existing system were identified for possible further action. These are described in Section 4.4 of the report. CP&L's position on each of these items is as follows:

- 4.4.a CP&L will perform a visual inspection of all electrical penetrations interconnecting the control room and the cable spread room. The purpose of this inspection will be to identify and repair any obvious leak paths between the two rooms. This inspection will be completed by March 1, 1981.
- 4.4.b A loss of air-cooled condensers, ACC-1A and ACC-1B would cause a loss of air conditioning in the control room but would not affect the integrity of the ventilation system. Therefore, a loss of the air cooled condensers would not affect the habitability of the control room during a radiological or toxic chemical release.

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- 4.4.c The control room radiation monitor (R-1) is set to automatically shift the control room ventilation system to an Emergency Recirculation Mode of operation at a general area radiation level of 2.5 mrem/hour. This setpoint is significantly less than the 15 mrem/hour calculated to exist in the control room resulting from direct shine from the containment using the assumption of a post-accident release of radioactivity equivalent to that described in U. S. NRC - Regulatory Guide 1.4, Assumptions Used for Evaluating the Potential Radiological Consequences of a Loss-of-Coolant Accident for Pressurized Water Reactors. Since the control room radiation monitor measures a direct radiation field, its relocation to an alternate location in the control room would not increase its effectiveness.
- 4.4.d The holes in the flexible joint downstream of the charcoal absorbers have been temporarily repaired. Permanent repairs will then be made as soon as repair parts become available.
- 4.4.e The control room contains sufficient self-contained breathing apparatuses for the minimum control room complement. Additional SCBA's are available in the Auxiliary Building and the Fire Services Building.

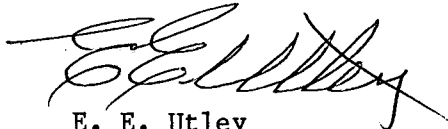
While conducting the review of the habitability of the control room against current NRC requirements, major differences were identified between the existing control room emergency ventilation system and the one currently required. These differences are pointed out in Appendix A, Comparison of the Robinson Control Room to the Criteria of NRC Standard Review Plans 6.4, 9.4.1 and 6.5.1 and in Appendix B, Additional Information Required By the NRC. Upgrading to the present criteria would result in major modifications to the control room ventilation system and would seriously impact the operation of the Robinson plant while modifications were being performed. CP&L is not convinced that such gross changes to the existing system are presently warranted. Furthermore, CP&L believes the Commission should review carefully on a cost/benefit basis the merits of these changes before requirements for modifications are published. Thus, CP&L does not commit to perform any ventilation system modifications other than those described in the preceding paragraph. Other deficiencies noted in the appendices, related to the provision of an emergency food supply and potassium iodide for control room occupants, will be acted upon by CP&L. Regarding the supply of potassium iodide, the State of South Carolina has informed CP&L that their Department of Health and Environmental Control will procure and stockpile potassium iodide near the H. B. Robinson site to supply emergency workers, and has established the program whereby the drug will be administered. CP&L intends to follow this program for the personnel at the H. B. Robinson site.

Several items necessary to bound the calculations of control room air inleakage and toxic chemical concentrations are incomplete as of this date. An air inleakage rate test is required to quantify the air inleakage, confirm the propriety of the assumptions used in the dose analysis of Section 5.0 and ensure that potentially significant leak paths are identified and sealed. This test will be performed during the first quarter of 1981 and the results provided to you following review by CP&L. In addition, toxic chemical shipments on nearby highways have not been quantified, since investigations of shippers to date have proved to be inconclusive. CP&L will investigate this area in more detail to determine if the postulated accidents discussed in Section 6.0 of the report are of real concern. The results of our investigations will be provided to you in a timely manner to aid in your review of our submittal.

The modifications and corrections of concerns related to section 4.4 of the report that CP&L has committed to above as well as the provision of an emergency food supply, the performance of the control room air inleakage test, and the investigations of postulated toxic chemical accidents will be performed as expeditiously as possible in consonance with other Three Mile Island related requirements and NRC requirements in other areas. A schedule for completion of each of these items has not been developed, but they will be completed prior to the NRC required date of January 1, 1983.

We trust that this information is suitable for you use in resolution of this item.

Yours very truly,



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

JJS/dk (N #11)

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