

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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
 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Requests exemption from App R Requirement III.0 requiring
 installation of lube oil collection sys.

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Carolina Power & Light Company

January 19, 1981

File: NC3514(R)

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Office of Nuclear Reactor Regulations
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
FIRE PROTECTION FOR REACTOR COOLANT PUMP BAYS

Dear Mr. Varga,

On November 26, 1980, Carolina Power and Light Company (CP&L) submitted the results of our evaluation of the acceptability of the installed fixed suppression system for the reactor coolant pump bays. We concluded the fixed suppression system would provide adequate fire protection in the pump bays and that a lube oil collection system was not needed to safely shut down the plant in the event of a lube oil system rupture subsequent to a seismic event.

Your staff advised us that there was an additional concern that a lube oil fire would result in a degradation of the steam generator supports. CP&L has evaluated this concern and has concluded that such degradation is not tenable. The foundation level for the steam generator supports is 238.33 feet while the foundation level for the reactor coolant pumps is 231.00 feet. The potential for a flash fire exists in the area of the steam generators due to lubricating oil spray or vapor from the reactor coolant pump oil system. However, a vapor induced fire involving Mobilarma 523 lubricating oil would be almost instantaneous and there would not be sufficient time to cause damage to the steam generator supports. A sustained fire would be possible only at the leak point or by accumulation of oil. The sufficient accumulation of oil for a sustained fire in the area of the steam generator supports which, in turn could cause possible degradation is not considered tenable due to the higher elevation of the steam generator supports and due to the fact that the reactor coolant pump is between the pressurized portion of the oil system and the steam generator supports and serves to shield the steam generator supports in the event of an oil system rupture.

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Mr. Varga

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Based on the information provided above and in our November 26, 1980 letter, CP&L requests an exemption from Appendix R requirement III.0 which requires the installation of a lube oil collection system. Accordingly, our check for \$4,000 is attached.

Should you have any questions regarding this issue, please contact my staff.

Yours very truly,



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

SDF/dk (N#22)

cc: Mr. R. B. Minogue
Mr. J. D. Neighbors
Mr. R. H. Vollmer