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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits final design & deviation details from NUREG-0737
 Item 2.F.1 "Add'l Accident Monitoring Instrumentation," per
 801215 commitments. Design basis & calibr for high range
 noble gas effluent monitors will assume TID 14844.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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Carolina Power & Light Company

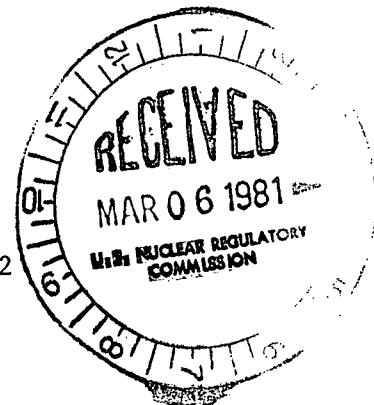
March 3, 1981

File: NG-3514(R)

Serial No.: NO-81-377

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
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
TMI ITEM II.F.1, "ADDITIONAL ACCIDENT
MONITORING INSTRUMENTATION"



Dear Mr. Denton:

By letter dated December 15, 1980, Carolina Power & Light Company (CP&L) made commitments for its H. B. Robinson Steam Electric Plant Unit No. 2 concerning NUREG-0737, "Clarification of TMI Action Plan Requirements," Item II.F.1, "Additional Accident Monitoring Instrumentation." For the sub-parts under this item concerning noble gas effluent monitoring and provisions for iodine and particulate sampling, CP&L committed to make available for NRC review final design details and document any deviations from NRC requirements by March 1, 1981. Final design details for both these items are now available at the Robinson Plant for review. The Robinson Plant does not deviate from NRC requirements concerning these items except one requirement contained in Table II.F.1-1, "High Range Noble Gas Effluent Monitors." In the definitions of "Design Basis Maximum Range" and "Calibration," the NRC states that design range values may be expressed in Xe-133 equivalent values. The H. B. Robinson Plant will assume a TID 14844 source term as opposed to assuming an Xe-133 source term only. The TID 14844 is representative of the activity expected during an accident and takes into consideration Xe-133 concentrations. The calculated activity levels would be overestimated due to the attenuation of the weak Xe-133 81 keV gamma if only Xe-133 was assumed. The design range values therefore are expressed in terms of $\mu\text{Ci/cc}$ of gross noble gas activity instead of Xe-133 equivalent. Also, the average energy of an assumed TID 14844 source term is much closer to the gamma energy of Cs-137 as opposed to Xe-133. Thus, Cs-137 will be primarily used as the calibration source.

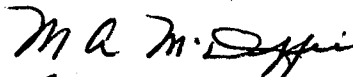
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Also defined in Table II.F.1-1 under "Design Consideration" is the term "inline." At H. B. Robinson, the term "inline" is being interpreted as the detector being located either inside the effluent duct or externally mounted on the effluent duct (online). This is opposed to "offline" monitoring which is interpreted as the effluent being monitored by a detector counting a representative, continuous sample of the effluent away from the duct. Depending upon the range of the monitor, the H. B. Robinson Plant makes use of inline detectors which are either internally or externally mounted on the effluent duct. CP&L does not consider this a deviation from NRC requirements and states their definition of the term "inline" for clarification only.

If you have any questions on this matter, please contact our staff.

Yours very truly,



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

JHE/jc (0571)

cc: Mr. J. D. Neighbors