

CP&L

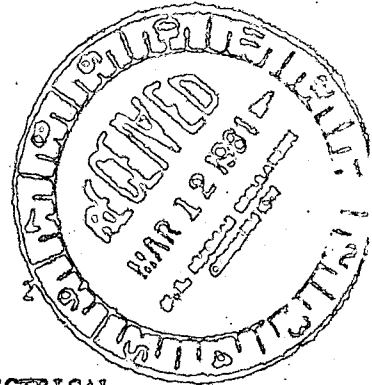
Carolina Power & Light Company

March 9, 1981

FILE: NC-3514(R)

SERIAL NO.: 10-11

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

ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRICAL
EQUIPMENT - RESPONSE TO PARTIAL REVIEW

Dear Mr. Varga:

I. SUMMARY

We have received and reviewed Mr. Novak's letter of February 23, 1981, concerning the Environmental Qualification of Safety-Related Electric Equipment. Mr. Novak requested that we review the alleged deficiencies identified in the "Partial Review, Equipment Evaluation Report by the Office of Nuclear Reactor Regulation for Carolina Power & Light Company's, H. B. Robinson Unit 2," and their ramifications and provide to you an overall finding regarding the continued safe operations of our facility. Our conclusion is that there are no concerns indicated in your letter which would interfere with the continued safe operation of H. B. Robinson Unit 2.

II. GENERAL COMMENTS AND CONCLUSIONS

The comments below deal with what we perceive to be the main points identified by your Partial Review, but there has been insufficient time to permit us to completely analyze each of your alleged deficiencies, nor have we been able to verify whether or not we agree that any of the identified concerns actually constitute a deficiency. This letter is not intended to provide a complete response to each of the items you have identified and we trust that we will be given an opportunity to deal with these items more fully at a later date.

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After a review of this matter by the responsible personnel, I can state that Carolina Power & Light Company knows of no concerns relating to the environmental qualification of safety-related electrical equipment which would interfere with the safe, continued operation of H. B. Robinson, Unit No. 2. Support for this conclusion may be found in our submittals of March 17, 1980, July 7, 1980, August 29, 1980, October 30, 1980, and January 30, 1981, and in the central qualification data file at the H. B. Robinson Plant. Additional comments on the alleged deficiencies identified in your Partial Review are given below.

One general comment which must be made is that several of the alleged "deficiencies" in the Partial Review appear to be, in fact, new requirements which have never before been articulated. Examples of this are the control room display instrumentation list, the new temperature criteria, and the detailed data requested on the aging programs. Moreover, much of the information to resolve the alleged deficiencies is available either in the submittals themselves or in the central qualification data file at the plant. None of these resources appears to have been accessed by the NRC staff to date. For example, of the thirty-eight Category B items listed in your Partial Review, nine have already been replaced as scheduled and their replacement was documented in Revision 2 to our Ninety Day Report which was submitted on October 30, 1980.

III. COMMENTS ON SPECIFIC AREAS

Carolina Power & Light Company is extremely concerned over the unusual method proposed by the NRC staff to obtain additional margin for temperature criteria. The stated purpose is to provide additional margin for equipment located in the upper regions of containment. In fact, there is no safety-related electrical equipment located in this area of containment and thus there appears to be no need for additional margin.

The containment pressure and temperature calculations used to determine the environmental service conditions were calculated using models approved by the AEC and the specific calculations were also reviewed and approved by the AEC staff. This formal approval was documented on May 18, 1979 in the "Safety Evaluation By the Division of Reactor Licensing, U. S. Atomic Energy Commission in the Matter of Carolina Power & Light Company, H. B. Robinson Unit No. 2, Docket No. 50-261." LOCA models have changed since this SER was written and CP&L has provided reanalyses as required which have also been reviewed and approved by the AEC staff, notably in a supplemental SER dated May 20, 1974. In none of the subsequent analyses or reviews has the accuracy and appropriateness of the containment pressure and temperature values been questioned. In light of this succession of prior approvals and absent any showing of technical justification for concern, CP&L has not performed a detailed evaluation of your pressure and temperature concerns. We do not believe that this issue has any adverse implications for either the qualification of the plant safety-related electrical equipment or the continued safe operation of H. B. Robinson Unit No. 2.

The DOR Guidelines specifically state in Section 4.1 that FSAR LOCA results should be used to establish environmental envelopes and also state in Section 4.2.1 that "...equipment qualified for a LOCA environment is considered qualified for a MSLE accident environment in plants with automatic spray systems not subject to disabling single component failures." The H. B. Robinson containment pressure has been calculated using AEC approved models and the results have also been specifically reviewed and approved by the AEC staff as discussed above. For the NRC to propose changing the long standing criteria and models used for LOCA analyses would represent a backfit of major proportions with implications which range far beyond the relatively narrow scope of environmental qualification. Furthermore, an attempt to impose such a major backfit and change in the unit design basis by means of a "partial review" of a response to an IE Bulletin appears to be inappropriate under the backfit procedures established by existing NRC practices, and also appears to be in conflict with Title 10, Part 50.109 of the Code of Federal Regulations. If in fact the NRC has reason to believe a change in the design basis should be considered, such action should proceed through existing NRC backfit procedures. Following those existing NRC backfit procedures ensures that the proposed modification will "provide substantial, additional protection which is required for the public health and safety or the common defense and security"; will ensure that the issue is fully evaluated and assigned the correct priority in the use of scarce NRC and industry resources and manpower, and also ensure that appropriate, generic criteria are established to permit a resolution of issue. While we currently see no reason for any change in the pressure and temperature calculational techniques, we would participate in an appropriate review of the issues involved and would, of course, cooperate in the development and implementation of any required changes.

Carolina Power & Light Company will provide additional information as required to resolve your concerns in the areas of submergence, chemical spray, and aging when your specific concerns are clarified, but our review indicates no concerns which would adversely impact the continued safe operation of H. B. Robinson Unit 2. CP&L's radiation service conditions were developed using the DOR Guidelines and our assumptions and techniques are discussed in an appendix to the Ninety-Day Report. Our review of this issue again indicates no concerns which adversely impact the continued safe operation of the plant.

IV. SCHEDULE INFORMATION

Carolina Power & Light Company is making every effort to ensure compliance with the June 30, 1982, deadline for achieving environmental qualification for our electrical equipment at the H. B. Robinson Plant. However, this deadline was based on the issuance of the final SER by February 1, 1981. It must be recognized that further delays in our receiving the final Safety Evaluation Report as well as changes in environmental qualification bases from those which have been established consistent with the DOR Guidelines may seriously jeopardize our ability to meet the June 30, 1982, deadline. It would be most beneficial if the final SER provided statements of the factual basis for each identified deficiency. It would also be most helpful if the Technical Evaluation Report prepared by NRC Region II could be

transmitted to us. The lack of specificity in the Partial Review makes it very difficult to even begin to develop additional data for your staff.

Yours very truly,

E. E. Utley

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

CSD/dk (N043)

cc: Mr. J. D. Neighbors

Sworn to and subscribed before me this 9 day of March, 1981.

Franklin Murray
Notary Public

My Commission expires: October 4, 1981

