

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8110130192 DOC. DATE: 81/10/07 NOTARIZED: NO DOCKET #  
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 AUTH. NAME: UTLEY, E. E. AUTH. AFFILIATION: Carolina Power & Light Co.  
 RECIP. NAME: VARGAS, S. A. RECIPIENT AFFILIATION: Operating Reactors Branch 1

SUBJECT: Provides revision to 810829 ltr re ESF override,  
 incorporating discussions to date.

DISTRIBUTION CODE: A0015 COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2  
 TITLE: General Distribution for after Issuance of Operating License

## NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
ACTION:	ORR #1 BCI 04	13 13		
INTERNAL:	D/DIR, HUM FAC08	1	DIR, DIV OF LIC	1
	ELD	1	I&E 06	2
	OR ASSESS BR	1	RAD ASMT BR	1
	REG FILE 01	1		
EXTERNAL:	ACRS 09	16 16	LPDR 03	1
	NRC PDR 02	1 1	NSIC 05	1
	NTIS	1 1		

001 1 4 1181

TOTAL NUMBER OF COPIES REQUIRED: LTR 41 ENCL 3



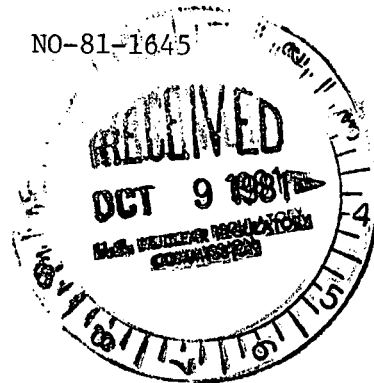
Carolina Power & Light Company

October 7, 1981

File: NG-3514(R)

Serial No.: NO-81-1645

Office of Nuclear Reactor Regulation  
ATTN: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555



H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
ENGINEERED SAFETY FEATURES OVERRIDE

Dear Mr. Varga:

In response to concerns raised by members of your staff regarding Engineered Safety Features Override, Carolina Power & Light (CP&L) addressed a letter to you, dated August 29, 1981, providing additional clarification. In this letter, CP&L committed to provide revisions to previous correspondence on this subject relative to the additional clarification. The following revisions to previous CP&L correspondence incorporates the discussions that have occurred to date:

- (1) January 19, 1979 to Mr. A. Schwencer, Page 2, Item 2

The control board has two operator actuated safety injection block switches used during normal plant shutdown. One prevents a safety injection actuation at less than 2000 psig due to either a low pressurizer pressure or a high steam line differential pressure signal. The other blocks the low Tave signal at less than 543°F. Both of these ESF blocks will annunciate on the control board. It has been determined for the following systems, Ventilation Isolation, Phase A Isolation, Phase B Isolation, Containment Spray, and Feedwater Isolation, that if the RESET button is engaged while an actuation signal is present (override), no other automatic or manual signals can re-initiate system action. However, each piece of equipment can be operated by the individual controls on the control board. Due to the two minute time delay in the Safety Injection (SI) reset circuit this concern is not applicable to the SI RESET button.

*Acc  
s  
1/6*

8110130192 811007  
PDR ADDCK 05000261  
PDR

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

- (2) December 7, 1979 Letter to Mr. Schwencer, Page 2, Item 2b

Please refer to CP&L's August 29, 1981 letter to Mr. Varga. This letter describes the Standing Order approved and modifications installed to implement controls on the Ventilation Isolation Safety Features and long term solutions to these concerns.

- (3) April 29, 1980 to Mr. A. Schwencer, Enclosure - Criteria 1 & 3

Criterion 1 - In keeping with the requirements of General Design Criteria 55 and 56, the overriding of one type of safety actuation signal (e.g., radiation) should not cause the blocking of any other type of safety actuation signal (e.g., pressure) for those valves that have no function besides containment isolation.

Response: It has been determined that for the following systems, Ventilation Isolation, Phase A Isolation, Phase B Isolation, Containment Spray, and Feedwater Isolation, if the RESET button is engaged while an actuation signal is present (override), no other automatic or manual signals can re-initiate system action. However, each piece of equipment can be operated by the individual controls on the control board. Due to the two minute delay in the Safety Injection (SI) reset circuit this concern is not applicable to the SI RESET button.

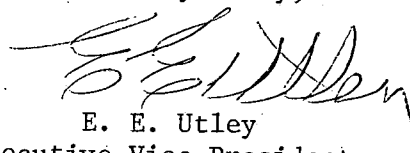
Criterion 3 - A system level annunciation of the overridden status should be provided for every safety system impacted when any override is active (see R.G. 1.47).

Response: The control board has annunciators to indicate when initial Engineered Safety Features actuation signals are blocked. However, a system level annunciation of an override does not exist on the control board.

Because of the clarification of our position on overriding of Engineered Safety Features, additional actions and modifications will be necessary. Details of these actions and schedules for their implementation are described in CP&L's August 29, 1981 letter to you.

If you have any questions regarding this matter, please contact my staff.

Yours very truly,



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

CLW/DW/lr (5784)

cc: Mr. W. J. Ross