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 UTLEY, E.E. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards documentation & commitments for completion of items
 in NUREG-0737, "Clarification of TMI Action Plan
 Requirements." Includes listing of items to be completed by
 810701 until commitment & position re items.

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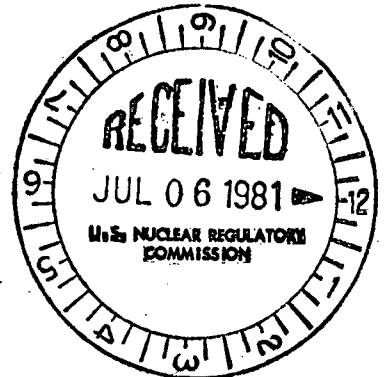
June 30, 1981

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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 NOS. 50-261
LICENSE NO. DPR-23
NUREG-0737: July 1, 1981 ITEMS



Dear Mr. Eisenhut:

Carolina Power & Light Company (CP&L) hereby forwards the required documentation and commitments for completion of NUREG-0737, "Clarification of TMI Action Plan Requirements" items which are applicable to the Robinson Steam Electric Plant Unit No. 2 (HBR) and required to be complete by July 1, 1981. Enclosure 1 contains a listing of these July 1, 1981 items along with CP&L's commitment. The attachments to this enclosure clarify CP&L's position on these items.

If you have any questions concerning these items, please contact our staff.

Yours very truly,

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

JHE/lr (0708)

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. J. D. Neighbors (NRC)

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ROBINSON NUREG-0737: July 1, 1981 ITEMS

<u>ITEM</u>	<u>TITLE</u>	<u>DESCRIPTION</u>	<u>CP&L COMMITMENT</u>	<u>REFERENCES</u>
II.B.1	Reactor Coolant System Vents	1. Design Vents	Complete	CP&L ltr. 12/31/79
II.D.1	Relief & Safety Valve Testing	2a. Complete Testing	To Be Determined	Attachment 1
II.E.1.1	Auxiliary Feedwater System Evaluation	1. Short-term	Complete	CP&L ltr. 6/8/81
II.E.1.2	Auxiliary Feedwater System Init. & Flow	1b. Initiation-Safety Grade 2c. Flow Indication-Safety Grade	Complete Complete	CP&L ltr. 6/8/81 CP&L ltr. 6/8/81
II.E.4.1	Dedicated Hydrogen Penetrations	2. Install	Complete	CP&L ltr. 12/31/79
II.E.4.2	Containment Isolation Dependability	5. Containment Pressure Setpoint 7. Radiation Signal on Purge Valves	Complete Complete	CP&L ltr. 12/31/80 Attachment 2
II.F.1	Accident Monitoring	3. Containment High Range Monitor Documentation	Complete	Attachment 3
II.K.3	Final Recommendation B&O Task Force	1a. Automatic PORV Isolation 5a. Automatic Trip of RCPs	Complete Complete	Attachment 4 CP&L ltr. 12/15/80

ATTACHMENT 1

Item II.D.1-2, "Relief and Safety Valve Test Requirements"

NUREG-0737 requires that CP&L prepare a plant-specific submittal confirming the adequacy of safety and relief valves based on its preliminary review of EPRI's generic test program results by July 1, 1981. The EPRI PWR Safety and Relief Valve Test Program will not be completed before July 1, 1981. Therefore, CP&L will not be able to complete its preliminary review of the results before that date. CP&L will continue to closely monitor the EPRI test program. Additionally, CP&L will confirm by letter the adequacy of safety and relief valves at H. B. Robinson after the EPRI test program is complete and CP&L has completed its preliminary review of the results.

ATTACHMENT 2

Item II.E.4.2.7, "Radiation Signal on Purge Valves"

NUREG-0737 requires that by July 1, 1981 containment purge valves and vent isolation valves must close on a high radiation signal. The Robinson Plant satisfies this requirement with existing equipment. Purge valves automatically isolate through the Ventilation Isolation System which is initiated through actuation of radiation monitors RMS 11/12. Detailed support information is available onsite for NRC review.

ATTACHMENT 3

Item II.F.1-3, "Containment High Range Monitor"

NUREG-0737 states that deviations from the requirements of this item must be identified by July 1, 1981. Robinson will satisfy all requirements with the following exception. The required calibrated radiation source calibration of the decade below 10 R/hr will be performed in the plant's test lab rather than in the installed location. Use of a portable source for insitu testing is impractical due to the size of the source required for the large volume ion chamber detector being employed. Electronic checks built into the instruments will adequately confirm loop operability in the installed configuration. Final design details are available onsite for NRC review.

ATTACHMENT 4

Item II.K.3.1, "Automatic PORV Isolation"

NUREG-0737 requires that licensees provide a system that uses the PORV block valves to protect against a small break LOCA. Based on the results of the Westinghouse report, WCAP-9804, dated February 1981, CP&L believes that no modifications are necessary. CP&L considers this item complete.