REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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EISENHUT,D.G. Division of Operating Reactors

SUBJECT: Forwards revised position re measuring & monitoring of airborne radioiodines,in response to NRC 791231 ltr.Revised position allows use of diversity of equipment of meet NRC requirements.

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CP&L

Carolina Power & Light Company

Serial No.: NO-81-1431

August 31, 1981

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
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
REVISED POSITION ON ITEM 2.1.8.C
LESSONS LEARNED SHORT TERM REQUIREMENTS

Dear Mr. Eisenhut:

Our letter of December 31, 1979 provided Carolina Power & Light Company's (CP&L) response to item 2.1.8.C of Mr. H. R. Denton's letter of October 30, 1979 which clarified NRC staff requirements resulting from NRC investigations of the TMI accident. Attached is CP&L's revised position on item 2.1.8.C regarding the measuring and monitoring of airborne radioiodines.

This revised position represents no relaxation of the level of compliance to item 2.1.8.C; it instead allows the use of a diversity of equipment to meet NRC staff requirements for this item.

Additionally, a revised Table 1 for item 2.1.4 is attached. These changes represent corrections to the subject table and not changes in the status of the systems named. These corrections were discussed with members of the NRC Lessons Learned Task Force during their audit of H.B. Robinson. The attached table documents the results of these discussions.

We trust the attached information is suitable to meet your requirements. If you have any questions on this subject please contact our staff.

Yours very truly,

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

JP/mag

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CP&L IMPLEMENTATION OF ITEM 2.1.8.C

a. January 1, 1980 Requirements

The H.B. Robinson Steam Electric Plant has the sampling and analysis equipment necessary to accurately assess the concentration of radioiodines in air in the presence of high concentrations of radionoble gases. Furthermore, procedures exist on the use of this equipment and personnel authorized to use this equipment have been adequately trained on its use.

b. January 1, 1981 Requirements

The H. B. Robinson Steam Electric Plant currently has the capability to analyze the sampling cartridge in the counting laboratory which is a low background, low contamination area. This area is currently ventilated with clean air from a unit separate from the Reactor Auxiliary Building air supply and return unit.

The purging of the samples to remove any entrapped noble gases will not be performed in the counting lab as this could contaminate the clean atmosphere. Purging will be performed in the Controlled Sample Room (Chem. Lab.). Currently, samples are dessicated using an oven and vacuum system. This process provides a more efficient means of removing entrapped noble gases.

P = High High Containment
S = S/I
T = Trip on Auto S/I

Table 1

H. B. ROBINSON UNIT NO. 2 REACTOR CONTAINMENT BUILDING PIPING PENETRATION

	System Piping Description	Classification Of Penetration	Post LOCA Condition
1.	Pressurizer Relief Tank Gas Analyzer	NE	Closed
2.	Pressurizer Relief Tank N_2 Supply	NE	Closed
3.	Pressurizer Relief Tank Make Up Primary Water	NE	Closed
4.	Primary System Vent Header	NE	Closed
5.	Reactor Coolant Drain Tank Gas Analyzer	NE	Closed
6.	Drain Header - Reactor Coolant Tank	NE	Closed
7.	Main Steam Header	NE	Closed
8.	Main Steam Header	NE	Closed
9.	Main Steam Header	NE	Closed
10.	Main Feedwater Header	NE	Closed
11.	Main Feedwater Header	NE	Closed
12.	Main Feedwater Header	NE	Closed
13.	Steam Generator Blowdown Line	NE	Closed
14.	Steam Generator Blowdown Line	NE	Closed
15.	Steam Generator Blowdown Line	NE	Closed
16.	Residual Heat Removal Loop Out	E	Open
17.	Residual Heat Removal Loop In	E	"S" Open

P = High High Containment Pressure
S = S/I
T = Trip on Auto S/I

Table 1 (continued)

H. B. ROBINSON UNIT NO. 2 REACTOR CONTAINMENT BUILDING PIPING PENETRATION

	System Piping Description	Classification Of Penetration	Post LOCA Condition
18.	Reactor Coolant Pump Cooling Water In	E	Close on P
19.	Reactor Coolant Pump Cooling Water Out	E	Close on P
20.	Reactor Coolant Pump Cooling Water Out	E	Close on P
21.	Excess Letdown Heat Exchanger Cooling Water In	NE	Closes on "T" SI
22.	Excess Letdown Heat Exchanger Cooling Water Out	NE	Closes on "T" SI
23.	Letdown Line	NE	"T" Closed
24.	Charging Line	E*	Open
25.	Reactor Coolant Pump Seal Water Supply Line (Loop 3)	E	Open
26.	Reactor Coolant Pump Seal Water Supply Line (Loop 2)	E	Open
27.	Reactor Coolant Pump Seal Water Supply Line (Loop 1)	E	Open
28.	Reactor Coolant Pump Seal Water Return Line	NE	Closed on "P"
29.	Reactor Coolant System Sample Line (Pressurizer Steam Sample)	NE	Closed
30.	Reactor Coolant System Sample Line (Pressurizer Liquid Sample)	NE	Closed
31.	Reactor Coolant System Sample Line (Loops 2 & 3)	NE	Closed
32.	Fuel Transfer Tube	NE	Closed
33.	Instrument Air Header	NE	Closed
34.	N_2 Supply to H_2 Vent System Valves	NE	Closed
35.	Containment Air Sample In	NE	Closed
36.	Containment Air Sample Out	NE	Closed

P = High High Containment Pressure
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T = Trip on Auto S/I

Table 1 (continued)

H. B. ROBINSON UNIT NO. 2 REACTOR CONTAINMENT BUILDING PIPING PENETRATION

	System Piping Description	Classification Of Penetration	Post LOCA Condition
37.	Containment Purge Supply Duct	NE	Closed
38.	Containment Purge Exhaust Duct	NE	Closed
39.	Plant Air Supply Header	NE	Closed
40.	Containment Purge	NE	Closed
41.	Containment Pressure Relief	NE	Closed
42.	Containment Vacuum Relief	NE	Closed
43.	Safety Injection Line	E	"S" Open
44.	Containment Spray Header	E	Open
45.	Containment Spray Header	E	Open
46.	Containment Sump Recirc. Line	E	Closed during injection Open during recirculation
47.	Containment Sump Recirc. Line	E	Closed during injection Open during recirculation
48.	Safety Injection Test Line - High Head	NE	Closed
49.	Ventilation System Cooling Water In	E	Open
50.	Ventilation System Cooling Water In	E	Open
51.	Ventilation System Cooling Water In	E	Open
52.	Ventilation System Cooling Water In	E	Open
53.	Ventilation System Cooling Water Out Fan/Motor	E	Open

P = High High Containment Pressure
S = S/I
T = Trip on Auto S/I

Table 1 (continued)

H. B. ROBINSON UNIT NO. 2 REACTOR CONTAINMENT BUILDING PIPING PENETRATION

System Piping Description	Classification Of Penetration	Post LOCA Condition
54. Ventilation System Cooling Water Out Fan/Motor	E	Open
55. Ventilation System Cooling Water Out Fan/Motor	E	Open
56. Ventilation System Cooling Water Out Fan/Motor	E	Open
57. Emergency Feedwater Header	E	Open
58. Emergency Feedwater Header	E	Open
59. Emergency Feedwater Header	E	Open
60. Accumulator Sample Line	NE	"T" Closed
61. Pump Discharge - Containment Sump	NE	Closed
62. Boron Injection - Loop 2 Cold Leg	E	Open
63. Boron Injection - Loop 1 Cold Leg	E	Open
64. Boron Injection - Loop 3 Cold Leg	E	Open
65. N_2 Supply	NE	Closed
66. Containment Test Channel Pressure	NE	Closed
67. Containment Test Controlled Leakage	NE	Closed
68. Containment Pressure Sensing Line	E	Open
69. Containment Pressure Sensing Line	E	Open
70. Containment Pressure Sensing Line	E	Open
71. Penetration Pressure Air Supply	E	Open
72. Pressurizer PT-458 To Dead Weight Cal.	NE	Closed

* Seal cooling is essential