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ACCESSION NBR:8109220224 DOC.DATE: 81/09/16 NOTARIZED: NO DOCKET #
FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261
AUTH.NAME AUTHOR AFFILIATION
UTLEY,E.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Responds to NRC 810824 ltr re implementation of emergency procedures & training for station blackout,per Generic Ltr 81-04.Any changes,per forthcoming Westinghouse owners group guidleines,will be made during Spring 1982 refueling outage.

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TITLE: Station Blackout (USI A-44)

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CP&L
Carolina Power & Light Company

September 16, 1981

File: NG-3514(R) Serial No.: NO-81-1524

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
EMERGENCY PROCEDURES AND TRAINING FOR
STATION BLACKOUT EVENTS

Dear Mr. Varga:

In response to your letter of August 24, 1981 regarding Carolina Power & Light Company's (CP&L) H. B. Robinson, Unit No. 2 (HBR2) implementation of emergency procedures and training for station blackout, as described in Generic Letter 81-04, CP&L provides the following information. Your letters indicated that the CP&L proposed schedule did not satisfy the urgency you had assigned to this matter. CP&L believes that its original schedule was adequate; however, insufficient information may have been provided to document that fact. The following information is provided to justify CP&L's original schedule.

In twenty years of power generation at the Robinson site, Unit 1 and Unit 2, there has never been a loss of offsite power. If there were a loss of offsite power, HBR2 has two redundant emergency diesel generators. Each generator provides sufficient power to maintain the unit at hot shutdown during a loss of offsite power. There has never been a simultaneous failure of both diesel generators as a result of a demand signal. However, in the event both diesel generators should fail, HBR2 has a third diesel generator for the Dedicated Shutdown (D/S) System. This D/S diesel generator can provide sufficient power to maintain the plant in a hot shutdown condition during the loss of offsite power, and loss of both emergency diesel generators. Finally, if there was a loss of offsite power, followed by a loss of both emergency diesel generators and then a loss of the D/S diesel, HBR2 could still be maintained at hot shutdown with the steam driven auxiliary feedwater (AFW) pump and the main steam safety relief valves. Neither of these systems requires any AC power.

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Presently in place at HBR2 are the following procedures for responding to the above events. Emergency Instruction EI-7, describes the actions to be taken during a station blackout. Four separate conditions are covered in this procedure; (1) two emergency diesels generators operable, (2) one emergency diesel generator operable, (3) both emergency diesel generators inoperable but the dedicated shutdown diesel generator operable, (4) all diesel generators inoperable (i.e., loss of all AC power). Emergency Instruction, EI-17, describes the actions to be taken if the emergency diesels generators fail to start on an automatic safety injection signal or station blackout. This procedure directs the operator actions necessary to restart either emergency diesel. Emergency Instruction, EI-18, describes the procedures necessary to implement safe shutdown of the plant during a loss of emergency busses (480V) and/or station D.C. batteries. These procedures describe how to operate the Dedicated Shutdown System and dedicated shutdown diesel generator. The above procedures describe the operator actions that would take place during a loss of power event.

HBR2 maintains a continuous training program for all licensed operators. The program starts with initial training which includes class work and simulator work. This work includes a review of loss of power events and the associated emergency instructions. Once this training is complete, the operators have quarterly reviews of the emergency instructions. Each year the operators also go through annual retraining classes. These classes again review the loss of power events and procedures. Finally, each operator has two weeks of simulator re-training which includes the loss of power transients. HBR2 operators are well qualified to cope with loss of power transients.

CP&L believes that the aforementioned procedures at HBR2, which are presently in place, adequately address the NRC station blackout concerns in the interim, until the Westinghouse Owners' Group (WOG) Emergency Guidelines become available this fall. It is felt that procedure revision at this time, prior to review of the WOG Emergency Guidelines, would be counterproductive. Appropriate changes to the HBR2 emergency procedures, if any are required, will be implemented in light of the Emergency Guidelines during the next refueling outage, currently scheduled for spring 1982.

CP&L believes that the schedule proposed in this letter is the most effective method to insure safe operation of HBR2 under loss of AC power events. HBR2 is presently prepared to respond effectively to a loss of power transient. The operators and plant equipment can respond to the full spectrum of power failure transients from loss of offsite power to loss of all AC power in a manner that will bring the plant to a safe condition in a timely fashion.

Should you have any questions regarding this information, please contact my staff.

Yours very truly,

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

DCS/lr (9656)

cc: W. J. Ross