

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8202120063 DOC. DATE: 82/02/08 NOTARIZED: NO DOCKET #  
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 AUTH. NAME: UTLEU, E.E. AUTHOR AFFILIATION: Carolina Power & Light Co.  
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Expresses concern re installation of reactor vessel level instrumentation sys. Doubt exists as to whether sys provides unambiguous indication of inadequate core cooling. Util will delay implementation until 830101 refueling.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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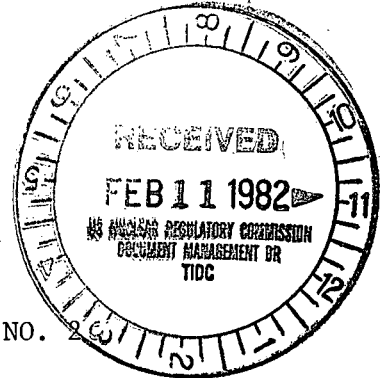
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Carolina Power & Light Company

FEB 08 1982

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 NO. 50-261  
LICENSE NO. DPR-23  
NUREG-0737 ITEM II.F.2 - INSTRUMENTATION FOR  
DETECTION OF INADEQUATE CORE COOLING

Dear Mr. Eisenhut:

Carolina Power & Light Company's submittal of December 29, 1981 on NUREG-0737 requirements stated that we were re-evaluating our previous commitment to install Reactor Vessel Level Instrumentation to meet Item II.F.2 requirements.

In our December 15, 1980 submittal on this item, we committed to purchasing and installing the Westinghouse "Reactor Vessel Level Instrumentation System" (RVLIS) on our H. B. Robinson - Unit 2. In reviewing recently completed tests performed on this system we find that serious doubt currently exists as to whether RVLIS (or any other system currently available) provides either unambiguous or easy-to-interpret indication of inadequate core cooling (ICC) as required. For these reasons, CP&L has serious concerns about installing a system which could possibly provide operators with erroneous information or information which could be erroneously interpreted. Additionally, installation will require an extensive allocation of resources, both in terms of manpower and man-Rem. CP&L believes that it is not prudent to expend those resources for a system that is still unproven and unapproved. Carolina Power & Light Company therefore will delay NUREG-0737 Item II.F.2, Reactor Vessel Level System, until the first refueling after January 1, 1983. This revised commitment assumes NRC prior approval of the system design.

We feel this delay will allow time for further analysis of test data on systems currently available and possibly advances in technology that could more adequately meet the intention of the stated requirements. CP&L's letter of December 31, 1979 described procedures and instrumentation presently available at H. B. Robinson to detect inadequate core cooling. CP&L believes that the instrumentation and procedures described there satisfactorily fulfill the need for instrumentation to detect inadequate core cooling during the time that the above analyses are taking place.

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If you have any questions on this issue, please contact our staff.

Yours very truly,



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

JJS/lr (6912)

cc: Mr. J. P. O'Reilly (NRC-Region II)  
Mr. W. J. Ross (NRC)