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ACCESSION NBR: 8203040344 DOC. DATE: 82/03/01 NOTARIZED: NO DOCKET #  
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 AUTH. NAME AUTHOR AFFILIATION  
 UTLEY, E.E. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to 811211 & 820125 requests for addl info re  
 environ qualification of electrical equipment. Reasons for  
 more cost effective review conducted at site listed.

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 TITLE: Equipment Qualification (OR & PRE-OL)

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Carolina Power & Light Company

MAR 01 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  
REQUEST FOR ADDITIONAL INFORMATION -  
ENVIRONMENTAL QUALIFICATION

Dear Mr. Eisenhut:

By letters dated December 11, 1981 and January 25, 1982, the NRC requested that Carolina Power & Light Company (CP&L) provide to the Franklin Research Center (FRC) certain documents for review from CP&L's central file for Environmental Qualification of Electrical Equipment. For the reasons listed below, CP&L believes that a more cost effective review could be conducted by the NRC and FRC at CP&L's General Office in Raleigh, N.C.

1. The Technical Specifications imposed by NRC's Order of October 24, 1980 require that CP&L maintain control of the Robinson central file. Sending the central file to FRC would violate that NRC Order.
2. The material requested is available for audit and review in CP&L's central file located at the Company's General Office in Raleigh, N.C. Additionally, the central file contains supporting information used by CP&L in determining the qualification of individual pieces of equipment. The test reports are only a part of the processes involved, and a review of only the test reports by FRC would provide an incomplete and out-of-context picture.
3. There appears to have been no attempt by FRC to consolidate the requested information. It is quite possible that they have requested the same document from several licensees. In the NRC's request of December 11, 1981, FRC acknowledges receipt of "Analyses of High Energy Line Break Outside Containment" from Robinson, yet requests a Postulated Pipe Failure Analysis Outside of Containment. The two analyses are one in the same. By not consolidating and comparing the requests, a needless duplication of effort and waste of resources would occur.

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PDR

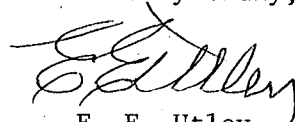
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Our action in this matter stems from our concern that an issue of the importance of Environmental Qualification receive a comprehensive and thorough review and evaluation. As has been previously discussed with your staff, CP&L believes that the most efficient and productive way to deal with this issue is to have an audit/meeting with the NRC and FRC at Raleigh to discuss these documents. Our staff will review and discuss the processes that were used to analyze various pieces of equipment. In this manner, the entire process can be reviewed and avoid an isolated piece of information leading to an erroneous conclusion.

If you have any further questions on this matter, please contact our staff. We stand ready to arrange the proposed meeting upon your approval of this proposal.

Yours very truly,



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

JJS/WRM/lr (4663)

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