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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME UTLEY, E. E. AUTHOR AFFILIATION Carolina Power & Light Co.
 RECIP. NAME DENTON, H. R. RECIPIENT AFFILIATION Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards "Detailed Technical Justification to Support
 Exemption Requests for Selected Zones," for App R
 exemptions requested in 820316 ltr. *SGG RPT*

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SGG



Carolina Power & Light Company

April 27, 1982



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
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
FIRE PROTECTION - APPENDIX R EXEMPTION REQUESTS

Dear Mr. Denton:

On March 16, 1982 Carolina Power & Light Company submitted information as required by 10CFR50, Appendix R for the Robinson Fire Protection Program. In our letter, we requested an exemption from the specific requirements of Section III.G.2 of Appendix R with respect to four specified fire zones in Robinson Unit No. 2, and indicated that additional information justifying those exemption requests would be provided by April 27, 1982. Enclosed for your information and review are the technical justifications for those four exemption requests.

In our March 16, 1982 submittal, Attachment No. 1, we described the modifications which CP&L proposes to make relative to Appendix R criteria. With respect to two of the fire zones, i.e. fire zone no. 27, (RHR pit) and the fire zone located in the service water pump bay, it is indicated that the modifications listed are required to meet III.G.1 or 2. It should be noted that the modifications in these two zones will not be required if the NRC grants the exemptions requested. Accordingly, this information supersedes the information contained in the table following page 5-1 in Attachment No. 1 to our March 16, 1982 submittal.

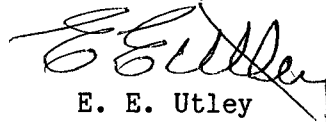
Should the Commission deny any of these requests for exemption, CP&L will, of course, require a reasonable amount of time subsequent thereto within which to prepare and submit CP&L's plans and schedules for making such modifications as may be necessary for compliance with the specific requirements of Section III.G.2.

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CP&L is presently preparing additional information supporting the exemption requested for the Reactor Coolant Pump lubricating oil collection system in our March 11, 1981 exemption request. This material will be submitted to the NRC as soon as possible. If you have any questions concerning this material, please contact our staff.

Yours very truly,



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

DLB/lr (n-40)
Enclosure

cc: Mr. J. P. O'Reilly (R-II)