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 EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 83-10D re automatic trip of reactor coolant pumps. Westinghouse Owners Group rept, "Evaluation of Alternate Reactor Coolant Pump Trip Criteria," presented info requested by NRC.

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Mr. Darrell G. Eisenhut, Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
SUPPLEMENTAL RESPONSE TO GENERIC LETTER NO. 83-10d
AUTOMATIC TRIP OF REACTOR COOLANT PUMPS

Dear Mr. Eisenhut:

SUMMARY

The purpose of this letter is to bring to a conclusion Carolina Power & Light Company's (CP&L) response to the Automatic Trip of Reactor Coolant Pumps issue (GL 83-10d).

BACKGROUND

Carolina Power & Light Company's previous letters dated April 22, 1983 and January 16, 1984 presented the plan for demonstrating compliance at H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2) with the criteria for resolution of TMI Action Plan Requirements Item II.K.3.5. These criteria were established in a letter from you to all Applicants and Licensees with Westinghouse designed Nuclear Steam Supply Systems (Generic Letter No. 83-10d) dated February 8, 1983. The submittals which fulfill the established requirements have been transmitted to the Nuclear Regulatory Commission (NRC) by Westinghouse Owners' Group (WOG) letters OG-117, dated March 9, 1984, and OG-110 dated December 1, 1983 (Sheppard to Mattson).

DETAILS

The WOG recently submitted to the NRC, via letter OG-117, the report entitled "Justification of Manual RCP Trip for Small Break LOCA Events." That submittal completes the WOG documentation comprising a generic reply to NRC Generic Letter No. 83-10d.

Subsection 2 of Section I of the attachment to NRC letter 83-10d provides guidance for justification of manual RCP trip. Subsection 2a requires that compliance with 10 CFR 50.46 be demonstrated in an Appendix K small break LOCA analysis given that the RCPs are tripped two minutes after the onset of reactor conditions corresponding to the RCP trip setpoint. As discussed in our letter dated January 16, 1984, the WOG has generically verified, in the OG-110 submittal, that predicted LOCA transients presuming the two minute

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Mr. D. G. Eisenhut

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delayed RCP trip are nearly identical to those presented in Safety Analysis Reports utilizing the W FLASH Evaluation model. Thus, the Final Safety Analysis Report for HBR2 demonstrates its compliance with the Subsection 2a guidelines.

The WOG has performed most probable, best estimate, W FLASH analyses to demonstrate, generically, compliance with the guidelines presented in Subsection 2b of Section I of the attachment to the NRC Generic Letter No. 83-10d. These analyses show that reactor coolant pumps may be tripped at any time during a LOCA event without resulting in excessive clad temperatures. The information presented in the generic report affirms the applicability of this best estimate analyses to the H. B. Robinson plant. Therefore, in combination with the Subsection 2a justification cited above, the best estimate analyses justify that manual RCP trip is acceptable for HBR2 when RCP trip setpoints consistent with Revision 1 to the Emergency Response Guidelines are in use. Furthermore, the generic report demonstrates that no additional contingency emergency procedures are required to address the scenarios which may follow a missed RCP trip setpoint.

CONCLUSION

In summary, the generic information presented by the WOG in the reports entitled "Evaluation of Alternate RCP Trip Criteria" and "Justification of Manual RCP Trip for Small Break LOCA Events" provides the response to NRC Generic Letter No. 83-10d for HBR2. The implementation of Revision 1 to the Emergency Response Guidelines in the plant-specific procedures with an appropriate RCP trip setpoint specified resolves all issues associated with automatic tripping of the reactor coolant pumps. This implementation will be completed at HBR2 by startup from the current outage. Carolina Power & Light Company considers our response to GL 83-10d to be complete.

If you have any further questions on this subject, please contact Mr. Sherwood Zimmerman at (919) 836-6242.

Yours very truly,



A. B. Cutter - Vice President
Nuclear Engineering & Licensing

PM/ccc (134NLU)

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)