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 VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Forwards list of changes/enhancements found acceptable
 during 841116 meeting w/NRC re alternate shutdown capability
 since issuance of 840808 SSER.

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Carolina Power & Light Company

SERIAL: NLS-84-434

NOV 30 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
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
ALTERNATE SHUTDOWN CAPABILITY

Dear Mr. Varga:

A meeting was held on November 16, 1984 between Carolina Power & Light Company (CP&L) and members of your staff to discuss the H. B. Robinson Alternate Shutdown Capability. The discussions focused on implementation changes and enhancements made by CP&L to the Alternate Shutdown Capability since the issuance of the staff's Supplemental Safety Evaluation Report (SSER) dated August 8, 1984. Enclosed in Attachment 1 is a list of the changes/enhancements which were found acceptable during the above meeting.

Should you have any questions concerning this letter, please contact Mr. Sherwood R. Zimmerman at (919) 836-6242.

Yours very truly,

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

PPC/ccc (691PPC)

Enclosure

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
NRC Resident Inspector (RNP)

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ATTACHMENT 1

CHANGES/ENHANCEMENTS TO
THE ALTERNATE SHUTDOWN CAPABILITY

- (1) Page 8, Section 2.4, first sentence, page 13, Section 2.5, third sentence, and page 17, Section 3.3, step 3 of the SER reference only one valve as being repaired. This is because the Appendix R Supplement Submittal specified a post-fire repair to regain operation of RHR heat exchanger bypass valve FCV-605 (CP&L letter NLS-84-220, dated June 6, 1984, pages 2-8, 3-5, 3-11). To enhance system operation during cooldown, CP&L has expanded this repair to include RHR heat exchanger outlet flow control valve HCV-758. The SSER also references a post-fire repair to supply motive power and control to the RHR flow control valves. It should be clarified that CP&L will be providing a regulated nitrogen supply to the RHR heat exchanger outlet valve HVC-758 and the RHR heat exchanger bypass valve, FCV-605.
- (2) The RHR system temperature repair procedure, referenced in several sections of the SSER, has been modified to provide only RHR heat exchanger inlet temperature. In our previous submittal to the NRC, CP&L indicated that the RHR heat exchanger outlet temperature would be monitored during plant cooldown. The monitoring of this temperature does not provide information required by the NRC during plant cooldown. The plant cooldown rate and reactor coolant temperature will be monitored by use of the RHR inlet temperature and flow. The operator will periodically monitor and record the RHR inlet temperature. Using this information, the cooldown rate can easily be determined by dividing the temperature difference by the time interval between readings.

The RHR outlet temperature would only provide the temperature difference across the heat exchanger which would not provide an indication of the cooldown rate.

- (3) The first sentence on page 13 of Section 2.5 of the SSER states that charging "pump speed will be manually controlled." Section 3.1(1) of the February 6, 1984 submittal specified setting the "charging pump speed to minimum." Table 3-1b on page 3-18 specified "manually control speed at pump." If instrument air to the charging pump flow controller is disabled by the fire, then local speed control will be prevented. In this case, reactor coolant makeup flow will be controlled by adjusting the charging flow control bypass valve CVC-309A and/or starting and stopping the charging pump.
- (4) Section 2.5, page 14, states that "the licensee has also committed to provide fire barrier modifications to protect the cables for the equipment which may be required to achieve safe shutdown following a fire in Fire Zone 13."

H. B. Robinson has been experiencing some problems in installing fire barriers in Fire Zone 13. Therefore, the safe shutdown equipment cables which were initially routed through Fire Zone 13 will be rerouted independent from Fire Zone 13.

- (5) Section 3.1.2 on page 15 should also reference the RHR system as being required for heat removal.

- (6) Attachment 1 of CP&L's clarification letter dated July 20, 1984, (Serial No. NLS-84-295 from Mr. A. B. Cutter to Mr. S. A. Varga) provided a summary of Method of Compliance for H. B. Robinson by Fire Zone. This information was utilized by your staff in Sections 2.2 and 2.3 of the SSER.

Additional clarification is provided as Enclosure 1 to this attachment. The following explanation is provided.

- a) As discussed in the SSER, Zone 27 (Residual Heat Removal Pump Pit) has been granted an exemption from III.G.2 and utilizes a cold shutdown repair procedure in accordance with III.L. However, in addition to the above, this area also utilizes a III.G.3 capability by virtue that the repair power cable terminations are energized by the dedicated/alternate power bus.

Therefore, credit is being taken for this III.G.3 capability and the appropriate notation is being made in Enclosure 1 to this attachment.

- b) As discussed in the SSER, a III.G.2 exemption has been requested for Fire Zone 5 (Component Cooling Pump Room) from the separation requirements for the CCW pumps. However, alternate shutdown (III.G.3) is available and is being credited in our safe shutdown procedures for certain other shutdown functions for a fire in Fire Zone 5. The appropriate notation is made in Enclosure 1 to this attachment.

- c) Section 2.3, page 6 of the SSER states that Zone 1 (DG Room B), Zone 2 (DG Room A), Zone 3 (Safety Injection Pump Room), and Zone 7 (Auxiliary Feedwater Pump Room) meet the III.G.2 separation criteria.

Alternate shutdown (as described in our supplemental submittal dated February 6, 1984 and June 6, 1984 and approved by your SSER dated August 8, 1984) is also available in the event of a fire in the above fire zones, since that capability is located independent of these rooms as well. Therefore, alternate shutdown capability (III.G.3) is available and is being credited for these four (4) fire zones and as such, CP&L does not plan to provide further protection for the boundary penetrations and seals in order to meet III.G.2 of Appendix R. The appropriate notation is made in Enclosure 1 to this attachment.

- d) Section 2.3 of the SSER states that an exemption from III.G.2 has been requested for the Service Water Pump Area (Fire Zone SWP). Alternate shutdown is also available in the event of a fire in Fire Zone SWP, since that capability is located independent of this zone. Therefore, credit is being taken for this III.G.3 capability and the appropriate notation is being made in Enclosure 1 to this attachment.

ENCLOSURE 1 TO ATTACHMENT 1

METHOD OF COMPLIANCE FOR H. B. ROBINSON

<u>ZONE</u>	<u>LOCATION</u>	<u>III.G.2</u>	<u>III.G.3</u>	<u>EXEMP.</u>
1	Diesel Generator Room B		X	
2	Diesel Generator Room A		X	
3	Safety Injection Pump Room		X	
4	Charging Pump Room		X	
5	Component Cooling Pump Room		X	X
6	Hot Lab/Counting Room	N/A		
7	Auxiliary Feedwater Pump Room		X	
8	Boron Injection Tank Room	N/A		
9	North Cable Vault		X	
10	South Cable Vault		X	
11	Hallway - Diesel Generators/MCC-5		X	
12	Hallway - Air Compressors		X	
13	Hallway - Component Cooling/Charging Rooms		X	
14	Waste Handling Room	N/A		
15	Hallway - HVAC Equipment		X	
16	Battery Room		X	
17	HVAC Equipment Room	N/A		
18	Former Unit 1 Cable Spread Room	N/A		
19	Relay, Computer, and Unit 2 Cable Spread Room		X	
20	Emergency Switchgear Room		X	
21	Rod Control Room		X	
22	Control Room		X	
23	Relay (Hagan) Room		X	
24	Containment Electrical Penetration Area		X	
25	Reactor Coolant Pump Bay (A, B, C)		X	
26	Containment HVAC (Filter) Units	N/A		
27	Residual Heat Removal Pump Pit		X	X
28	Pipe Alley		X	
SWP	Service Water Intake		X	X
TB	Turbine Building	X		
30	D/G Fuel Oil Storage Area		X	

Note: Vertical Bar in margin indicates change from Attachment 1 to CP&L letter from A. B. Cutter to Mr. S. A. Varga dated July 20, 1984, Serial No. NLS-84-295.