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 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Forwards response to 840419 request for addl info re
 NUREG-0737, Item II.F.2, "Inadequate Core Cooling
 Instrumentation Sys." Tentative dates for implementation
 milestones provided.

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Carolina Power & Light Company

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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
ADDITIONAL INFORMATION REGARDING INADEQUATE
CORE COOLING INSTRUMENTATION SYSTEM, NUREG-0737, ITEM II.F.2

Dear Mr. Varga:

SUMMARY

Your Generic Letter 82-28 "Inadequate Core Cooling Instrumentation (ICCI) System" dated December 10, 1982 requested information regarding Carolina Power & Light Company's (CP&L) plans for an Inadequate Core Cooling (ICC) instrumentation system. Our submittals dated April 1, 1983 and April 26, 1983 described the proposed system. The NRC Safety Evaluation Report (SER) was issued on December 31, 1984. This letter provides further information regarding your concerns and our tentative implementation schedule for the system.

DISCUSSION

The NRC SER contained two enclosures: a Request for Additional Information and a set of milestones for implementation of the inadequate core cooling instrumentation. The Request for Additional Information had been telecopied to CP&L on April 19, 1984 and was discussed in a conference call between our staffs on May 17, 1984. Enclosure 1 to this letter provides an updated response to your concerns. Enclosure 2 provides tentative dates for the implementation milestones.

Questions regarding this matter may be referred to Mr. Stephen D. Floyd at (919) 836-6901.

Yours very truly,


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

JSK/ccc (1081JSK)

Enclosures

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

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ENCLOSURE 1

RESPONSE TO
REQUEST FOR ADDITIONAL INFORMATION

1. As stated in the April 26, 1983 submittal, 11 thermocouples are currently not functional. Please provide the following information:
 - (a) when did the licensee notice their failure?;
 - (b) describe the cause of the failure; and
 - (c) provide a schedule and the plan to correct the failure.

Response

As stated during the May 17, 1984 conference call, the thermocouple failures were random both in cause and timing. A schedule for replacement/upgrading was provided in our December 31, 1984 NUREG-0737 Supplement 1 submittal as part of the Regulatory Guide 1.97 implementation.

2. It was stated that "the thermocouples do not meet safety grade criteria, do not meet environmental qualification in accordance with NUREG-0588, do not isolate from the non-IE plant computer and do not have extended temperature range from 200°F to 1800°F." Please provide specific schedules and a detailed description for upgrading the CET system including the cables, connectors, penetrations, primary and backup indicators, and compensation junction boxes.

Response

A description of our plans for replacement/upgrading of the core exit thermocouples was provided in our December 31, 1984 NUREG-0737 Supplement 1 submittal as part of the Regulatory Guide 1.97 implementation.

3. It was stated that "the core cooling monitor does not meet environmental qualification requirements. Resolution of qualification deficiencies are pending and a supplemental report will be submitted." Please provide the supplemental report for staff review and describe the plan for upgrading the core cooling monitor to full compliance with the NUREG-0737 Item II.F.2 requirements.

Response

No individual report will be generated on this equipment, but the core cooling monitor (CCM) is now addressed in our Regulatory Guide 1.97 (R.G. 1.97) program; information relating to qualification is summarized as follows:

1. Inputs to CCM are: RCS Hot Leg Water Temperature, RCS Cold Leg Water Temperature, Wide Range RCS pressure, Narrow Range RCS pressure, and selected Core Exit Thermocouples. All designated inputs to the CCM have been replaced by qualified components or are to be replaced as stated in our December 31, 1984 NUREG-0737 Supplement 1 submittal.
2. Upgrading of the CCM input sources will obviate isolation devices for these inputs.
3. The designation of the CCM as Category 3 equipment within our R. G. 1.97 program precludes the need for qualification. In addition, its location within the control room places it in a mild environment which, in accordance with 10CFR50.49, does not require qualification.
4. Since the HBR2 CCM provides mounting space for additional R. G. 1.97 designated indicators, the rack will be analyzed to be seismically qualified to meet R. G. 1.97 requirements.

All qualification upgrading will be accomplished per the R. G. 1.97 schedule submitted with our December 31, 1984 NUREG-0737 Supplement 1 transmittal.

ENCLOSURE 2

MILESTONES FOR IMPLEMENTATION OF
INADEQUATE CORE COOLING INSTRUMENTATION

1. Submit final design description (by licensee) (complete the documentation requirements of NUREG-0737, Item II.F.2, including all plant-specific information items identified in applicable NRC evaluation reports for generic approved systems).

Response

Information regarding our Inadequate Core Cooling Instrumentation System, including a description of our proposed Westinghouse Reactor Vessel Level Instrumentation System (RVLIS), was provided in our April 26, 1983 response to Generic Letter 82-28. A Safety Evaluation Report accepting the RVLIS was issued on December 31, 1984. Further information is provided in Enclosure 1 of this submittal and additional plant specific information, including any deviations from the generic design, will be provided in our implementation letter (see Response 6).

2. Approval of emergency operating procedure (EOP) technical guidelines - (by NRC).

Note: This EOP technical guideline which incorporates the selected system must be based on the intended uses of that system as described in approved generic EOP technical guidelines relevant to the selected system.

Response

The Procedure Generation Package for the EOPs was submitted by our letter dated July 2, 1984. The HBR2 specific technical guidelines are based on the Westinghouse Owners' Group generic technical guidelines.

3. Inventory Tracking Systems (ITS) installation complete (by licensee).

Response

The HBR2 Reactor Vessel Level Indication System (RVLIS) was installed during the recently completed Steam Generator Replacement Outage.

4. ITS functional testing and calibration complete (by licensee).

Response

Completion of calibration is currently scheduled for mid-April 1985.

5. Prepare revisions to plant operating procedures and emergency procedures based on approved EOP guidelines (by licensee).

Response

Emergency procedures based on approved EOP guidelines are currently implemented. The current version does not consider use of the RVLIS. These procedures will be upgraded when the RVLIS system is declared fully operational.

6. Implementation letter report to NRC (by licensee).

Response

Submittal of the Implementation Letter to NRC is currently planned for May 20, 1985.

7. Perform procedure walk-through to complete task analysis portion of ICC system design (by licensee).

Response

The task analysis portion for the ICC system will be performed as part of the Detailed Control Room Design Review (DCRDR) described in our December 31, 1984, NUREG-0737, Supplement 1 submittal.

8. Turn on system for operator training and familiarization.

Response

Classroom training for RVLIS familiarization has been completed. Operators will be able to observe RVLIS during subsequent testing since it is located in the control room.

9. Approval of plant-specific installation (by NRC).

Response

This is an NRC action item.

10. Implement modified operating procedures and emergency procedures (by licensee).

Response

Implementation is contingent upon completion of Item 9, above, by NRC. Operating and emergency procedures will be modified and implemented 90 days after the NRC approval of the plant-specific RVLIS.