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SUBJECT: Forwards responses to concerns discussed in 850118 telcon re
 plant-specific items concerning SER for Westinghouse Owners
 Group generic shunt trip mod.

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FEB 18 1985

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 SHUNT TRIP MODIFICATION

Dear Mr. Varga:

A conference call was held between Carolina Power & Light Company (CP&L) and the NRC on January 18, 1985 to discuss the NRC's concerns with plant-specific items regarding the safety evaluation report for the Westinghouse Owners' Group generic shunt trip modification. A summary of the concerns and the CP&L response to each is contained in the enclosure to this letter.

Questions your staff may have regarding this matter may be referred to Mr. Jan Kozyra at (919) 836-7924.

Yours very truly,

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

JSK/ccc (1145NLU)

Enclosure

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

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ENCLOSURE

1. Concern

The bypass breaker position indication is not on the main control board. CP&L was asked to commit to provide this during the next outage (Item 1).

Response

CP&L believes providing a reactor trip bypass breaker indication on the RTGB is not necessary at HBR2. Although the reactor trip breaker indication is available, the breaker position indicator is not used as a first indication of a successful reactor trip. Upon receipt of a reactor trip first out annunciator, the operator would verify that all rods are inserted by checking the rod bottom bistables, and that nuclear power was decreasing. In the event of a valid trip signal and the failure of the reactor trip breakers and/or bypass breakers to open, the operator is instructed to first attempt to manually trip the reactor with the RTGB pushbutton (local trip). Information on the exact breaker position is recorded on the existing Westinghouse P-250 computer (sequence of events), which is available in the control room. Additional information pertaining to our Westinghouse P-250 computer was provided in our response to Generic Letter 83-28, dated November 7, 1983 (LAP-83-517).

Therefore, CP&L believes our current measures as discussed above to be adequate and a bypass breaker position indicator is not necessary.

2. Concern

The NRC requests that CP&L change procedures to provide an undervoltage trip of the bypass breaker prior to placing it in service. This should be a manual trip from the reactor protection system rack (Item 10).

Response

CP&L has incorporated appropriate changes to the existing procedures to provide an undervoltage trip of the bypass breakers prior to placing them in service. The undervoltage trip attachment (UVTA) trip is a manual trip from the reactor protection system rack.

3. Concern

The NRC is concerned that CP&L has no provisions other than administrative for verification that jumpers installed for test purposes have been removed. A possible means of verification by testing was discussed (Item 9).

Response

As discussed in our December 27, 1984 letter, CP&L has developed a maintenance surveillance test procedure in which the operability of the control room manual reactor trip switch contacts and wiring are tested at refueling intervals. This test procedure does not utilize permanently

installed test connections; jumpers are used between the terminals to block the reactor trip conditions and to keep the undervoltage trip device energized during the test. These jumpers are necessary in order to independently check the signals and functions of the undervoltage trip attachment and shunt trip attachment.

In addition to the independent check on jumper removal, a test to verify that the jumpers have been removed will be incorporated in the existing procedure. The functional test will be performed after the removal of the jumpers and the test will be incorporated into the existing procedure prior to its use during the next refueling outage.

4. Concern

The NRC noted that CP&L had not submitted proposed Technical Specifications for the shunt trip modification. They stated that guidelines for the specifications were being prepared and discussion of this matter should be deferred until the guidelines are published.

Response

None required at this time.