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 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Informs of current plans re calibr of reactor vessel level instrumentation sys, per NUREG-0737, Item II.F.2. Emergency procedures will be submitted by 851031. Procedure implementation scheduled for 90 days after approval.

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Carolina Power & Light Company

APR 15 1985

SERIAL: NLS-85-117  
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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  
NUREG-0737, ITEM II.F.2  
INADEQUATE CORE COOLING INSTRUMENTATION SYSTEM

Dear Mr. Varga:

#### SUMMARY

The purpose of this letter is to inform you of Carolina Power & Light Company's (CP&L) current plans regarding the calibration of the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) Reactor Vessel Level Instrumentation System (RVLIS).

#### BACKGROUND

Your letter dated December 31, 1984 requested additional information regarding CP&L's plans for an Inadequate Core Cooling Instrumentation System. Carolina Power & Light Company responded on February 1, 1985, stating that the completion of the RVLIS calibration was scheduled for mid-April 1985. In addition, submittal of CP&L's implementation letter was planned for May 20, 1985.

#### DISCUSSION

The current RVLIS power source requires modification because of transient switching effects identified while attempting to calibrate the system. Due to additional work needed to change the power source, CP&L cannot complete the RVLIS calibration in mid-April as initially planned. The necessary design changes, procurement and qualification of materials, field support, and check-out to support the calibration of RVLIS will be completed by September 30, 1985.

The RVLIS calibration information is also needed prior to revising the plant-specific emergency procedures which are based on the WOG generic EOP guidelines, Rev. 1. Therefore, the revised plant specific emergency procedures will not be provided as part of CP&L's implementation letter scheduled to be submitted by May 20, 1985. The revised procedures will be submitted separately by October 31, 1985.

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## CONCLUSION

Carolina Power & Light Company believes the change to the power source does not deviate from the generic Westinghouse RVLIS design. The RVLIS implementation letter is still scheduled to be submitted to NRC by May 20, 1985, with the exception of the plant-specific emergency procedures that require RVLIS calibration information.

The Company currently anticipates completion of the necessary changes and calibration of the RVLIS by September 30, 1985. The revised plant-specific emergency procedures are scheduled to be submitted to your staff by October 31, 1985. Per our February 1, 1985 submittal, operating and emergency procedure implementation is contingent upon NRC approval of the plant-specific RVLIS installation. Therefore, procedure implementation remains scheduled for 90 days after NRC approval.

If you have any questions on this subject, please contact Mr. Jan Kozyra at (919) 836-7924.

Yours very truly,



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

ONH/ccc (1355JSK)

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