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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
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 MCDUFFIE, M. A. J Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Discusses proposed resolution of commitment inconsistency discussed on B60107 re implementation of reactor vessel level indication sys. (RVLIS) RVLIS implementation will be completed as part of Reg Guide 1.97 effort.

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JAN 29 1986

M. A. McDUFFIE
Senior Vice President
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Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing - A
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
IMPLEMENTATION OF REACTOR VESSEL LEVEL INDICATION SYSTEM (RVLIS)

Dear Mr. Rubenstein:

Carolina Power & Light Company (CP&L) has made two commitments regarding the implementation of the RVLIS at H. B. Robinson Steam Electric Plant Unit 2 (HBR2) in responses to (1) Generic Letter 82-28 (GL 82-28) and (2) NUREG-0737, Supplement 1. This letter proposes resolution of the commitment inconsistency as discussed with the Project Manager on January 7, 1986.

Carolina Power & Light Company's response to GL 82-28, modified by our letter of September 23, 1985, commits to calibration and implementation of the RVLIS during Refueling Outage 10 currently scheduled to begin February 1, 1986. Our response to NUREG-0737, Supplement 1 was provided on December 31, 1984 in response to the NRC order dated February 21, 1984. As part of this response, CP&L committed to complete Regulatory Guide 1.97 (RG 1.97), Rev. 3 items three months after the end of Refueling Outage 11; RVLIS is a RG 1.97 item.

Carolina Power & Light Company is planning a replacement of the Core Exit Thermocouple system as part of the RG 1.97 work during Refueling Outage 11. One vendor has proposed to provide a cabinet for the Core Exit Thermocouples which would provide electronics for the subcooling margin monitor and RVLIS as well. This combined cabinet for the inadequate core cooling instrumentation system (ICC) is particularly attractive for human factors considerations in the control room and to conserve available space in other parts of the plant. In addition, if the calibration of RVLIS were performed this outage as scheduled, it may be necessary to recalibrate this system after the electronics are replaced as described above. The calibration data are necessary to prepare the plant specific procedure which is part of the implementation.

Carolina Power & Light Company believes that the greatest overall benefit would be gained by using a combined ICC cabinet and intends to pursue this option if it proves to be ultimately feasible. Further, the NUREG-0737, Supplement 1 order has a higher regulatory priority than GL 82-28 and our response should take precedence accordingly. For these reasons, CP&L intends to complete the RVLIS implementation as part of the

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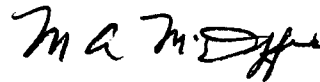
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overall RG 1.97 effort. Therefore, the required Technical Specification change and implementation letter will be submitted in accordance with the RG 1.97 compliance date which is scheduled for 3 months after Refueling Outage 11.

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

Yours very truly,

A handwritten signature in dark ink, appearing to read "M A McDuffie". The signature is fluid and cursive, with the first and last names being more prominent than the middle initial.

M. A. McDuffie

MAM/ccc (3241JSK)

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