CP&L

Carolina Power & Light Company

Regulatory File Cy.

May 18, 1977

FILE: NG-3514 (R) SERIAL: NG-77-598

Director of Nuclear Reactor Regulation
ATTN: Robert W. Reid, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D. C. 27609

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
FACILITY OPERATING LICENSE NO. DPR-23

Dear Mr. Reid:

By telephone request of March 17, 1977, your staff asked Carolina Power & Light Company to provide information concerning the history of H. B. Robinson steam generator tube integrity. Submittal of this information by telecopier was requested by March 22, 1977 and the Company was requested to formally provide the information in a follow-up letter. The attachment to this letter provides the specific information requested and completes our compliance with the NRC's verbal request.

Over the past several months, the Company has received many NRC "rapid survey requests" via telephone with instructions to provide the information within a very short time frame. Explanations for these requests have varied, but, in many cases, no specific reason for why the information was needed so rapidly or how it was to be used has been provided.

Carolina Power & Light Company is committed to assuring that its plants are operating both safely and efficiently. Therefore, if there are potential items of concern affecting the safety of our plants, we believe that the NRC should identify their specific concern so that the Company can make its own appropriate safety evaluations. Furthermore, if the issue is of such concern that it requires immediate attention by the NRC, formal notification should follow the telephone request, along with an explanation of the urgency of the request.

There have been recent requests in which a large amount of information is required, e.g. design data, test data, safety and performance evaluations, etc. The method of "rapid survey" is not prudent for these cases. If the NRC desires this type of information, the NRC should provide proper notification and allow adequate time for the utility to perform an evaluation of the effects of such events for the specific plant. The time allowed for most of the previous responses (generally 1 to 5 days) has been inadequate for CP&L to assemble and evaluate the requested information in the manner that we would like to do.

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The Company realizes that there are situations which require immediate attention. However, complete identification of the problem by the NRC and sufficient evaluation time are both necessary if the Company is expected to provide information of value to the NRC. Emergency situations should be identified as such and followed up by formal NRC correspondence delineating the NRC's concern. Information which is not urgently needed should be obtained through the normal method of formal notification.

The Company appreciates the attention the NRC gives to matters of plant safety. We would also appreciate your cooperation in reducing the number of informal rapid survey requests that we have been experiencing.

Yours very truly,

E. E. Utley
Senior Vice President
Power Supply

MFP/gsm

Attachment

H. B. ROBINSON UNIT NO. 2

DOCKET NO. 50-261

RESPONSE TO NRC RAPID SURVEY REQUEST

a. Significant operating history

1. O. L. date - Full Power 9/23/70
2. Full power operation - 3/7/71
3. Major period(s) of down time (non-refueling) - See Operating Reports

b. Materials of construction for major secondary system components

1. S. G. tubes - Ni-Cr-Fe alloy, Inconel ASME-SB-163-61T
2. S. G. tube sheet - N/A
3. S. G. tube support plates - ASME-SA-336 MN Moly-Steel (Primary side Inconel clad)
4. Condenser tubes - Admiralty
5. Other - FW Heater #6 - Stainless Steel; FW Heaters 1-5 - Admiralty

c. Operational history of secondary water treatment

1. Period of use of phosphates - 1971 to present
2. Period of use of AVT - N/A
3. Period of use of condensate demineralization - N/A
4. Other - N/A

d. Condenser cooling water - typical chemical composition

Low alkaline, @5 ppm cl, @5 ppm Na, @ ppm Si, 0.2-0.3 ppm Fe, No Hardness, .03-.05 ppm Cu

e. History of significant condenser tube leakage

1. Date discovered - Page 2
2. How discovered - Routine preventive maintenances and chloride indication
3. Leakage associated - Page 2

f. Denting history

1. Date discovered - 1976
2. How discovered - Routine eddy current inspection
3. Leakage associated (gpm) None

g. Steam Generator Tube plugging history

1. Dates - Page 3
2. Number of tubes - Page 3

h. Operating restrictions imposed on the plant due to degraded S. G. conditions. None

H. B. ROBINSON UNIT NO. 2
CONDENSER LEAK RATE HISTORY AT CPL

1975		1976		1977	
DATE	gpm	DATE	gpm	DATE	gpm
2-26	29.7	1-07	16.3	1-8	0.0
3-13	73.9	1-21	3.1	1-24	2.9
3-26	54.6	2-04	14.9	2-4	1.9
4-10	71.2	3-17	14.8		
6-12	2.0	4-01	11.3		
6-27	1.5	4-22	14.4		
7-23	3.0	5-05	8.4		
8-15	10.6	6-02	3.6		
8-26	2.0	6-18	13.2		
9-25	5.2	7-13	21.5		
10-24	2.8	8-13	26.7		
		9-14	27.7		
		10-12	12.3		
		12-28	2.3		

H. B. ROBINSON UNIT NO. 2
STEAM GENERATOR TUBE PLUGGING HISTORY

Date	Number Tubes Plugged		
	S.G.-A	S.G.-B	S.G.-C
Installation			2
71	92		92
5/13-6/5/72	27	4	2
3/16-5/5/73	2		
11/29/73			1
5/16-5/22/73	9	22	7
4/75	2	9	
11/75	2	5	11
11/76	7	5	
Totals	141	45 (46)	115 (116)