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RESPONSE TO NRC'S REQUEST DTD 01/24/78 REQUESTING EVALUATION
ADDRESSING THE EFFECTS OF CHANGES IN UNIT 2 OPERATION AND THE
RESOLUTION OF SIGNIFICANT ISSUES SINCE 07/31/75, UPON THE
ACCEPTABILITY OF OPERATION AT 2300 MWT.

PLANT NAME: H B ROBINSON - UNIT 2

REVIEWER INITIAL: XJM
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GENERAL DISTRIBUTION FOR AFTER ISSUANCE OF OPERATING LICENSE.
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Carolina Power & Light Company

February 6, 1978

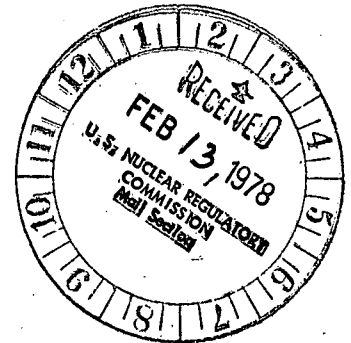
REGULATORY DOCKET FILE COPY

FILE: NG 3514(R)

SERIAL: GD-78.339

Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

RE: H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
2300 MWt SAFETY EVALUATION



Dear Mr. Case:

Mr. Robert W. Reid's letter of January 24, 1978, requested that the Company submit an evaluation addressing the effects of changes in H. B. Robinson Unit No. 2 operation and the resolution of significant issues since July 31, 1975, upon the acceptability of operating at 2300 MWt. As the NRC Staff is aware, the Company had previously reviewed all such issues prior to the resumption of the Atomic Safety and Licensing Board (ASLB) hearing on January 9, 1978, in anticipation of the Board concluding the proceedings on that date. As expressed by CP&L at the hearing, all evaluations, analyses, etc. involving core operation which have been submitted to the Commission have always been conducted for the power level of 2300 MWt. (Transcript at 1912, 1938.) Pursuant to your request, however, we are providing the following specific information which constitutes our response to Mr. Reid's letter and references submittals made by the Company and license amendments and safety evaluations issued by the NRC:

ECCS

On October 17, 1975, the NRC issued Amendment No. 13 to the Robinson Unit No. 2 license. This amendment was supported by our submittals of October 2, 1974, March 14, 1975, April 18, 1975, June 20, 1975, and July 24, 1975, and by the NRC Safety Evaluation dated October 17, 1975. Amendment No. 13 concluded the necessary ECCS reevaluation by CP&L and the NRC and removed restrictions which had been in effect pending a satisfactory evaluation by CP&L. As indicated in our submittals and in the NRC Safety Evaluation, the power level analyzed and found acceptable for this evaluation is 2300 MWt.

Exxon Fuel

Cycle 4 operation, which was the first refueling with Exxon fuel, was authorized by Amendment 15 which was issued by the NRC on December 3, 1975. Again, our evaluation submitted on October 14, 1975, and supplemented by letters dated August 3, August 22, October 17, November 13, November 18, and November 24, 1975, address operation at 2300 MWt. The analyses, including DNB calculations, transient analyses, ECCS performance, safety margins, rod bow, densification, etc. were all done for 2300 MWt and found acceptable by NRC.

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336 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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Rod Bow

Rod bowing was addressed during several meetings in late 1976 and early 1977 between the NRC Staff, Exxon, and Carolina Power & Light Company. The NRC letter of January 7, 1977, concerning rod bow indicates that no changes to the Robinson technical specifications are necessary. As reflected in our response dated February 11, 1977, all the transient analyses, penalties in DNBR due to rod bowing, and absorption of those penalties by credit applied from worst anticipated transient and accepted by NRC, apply to 2300 MWt operation. This issue, therefore, has also been found acceptable at the uprated power level.

Upper Head Temperature

Amendment 24, which was issued on December 3, 1976, authorized operation of Cycle 5. This amendment was supported by our response of November 17, 1976, to the Commission's Order of August 27, 1976. The subject Order required reanalysis of the ECCS performance in view of higher upper head temperatures. Our analysis was performed at 2300 MWt and found acceptable as stated in the Commission's Safety Evaluation Report.

We believe that the preceeding information completely provides the references which the Staff has requested. The other amendments issued since the SER Supplement 1 on July 31, 1975 (Amendments 14, 16, 17, 18, 19, 21, 22, 23, 24, 26, 27, 28, and 29) did not involve changes in the facility which directly relate to operation at 2300 MWt for the purposes of a safety evaluation. Nevertheless, as stated in all our correspondence, all analyses submitted to the NRC have been done at 2300 MWt. If we can provide you with further references to our previous submittals, please contact our staff.

In the latter part of Mr. Reid's letter of January 24, he indicates that the NRC Staff has initiated a general rereview of offsite accident dose calculations. In view of the fact that the NRC has been aware of our request for authorization of the power uprating for nearly four years, we are disturbed that the Commission would initiate a general rereview at this particular time as a condition to approving the uprating when prior reviews by NRC have already demonstrated an acceptable analysis for 2300 MWt operation. As you are aware, the NRC indicated to the ASLB during the January 9 Hearing that it hoped to have the safety evaluation for the uprating completed in time for startup of Cycle 6. In response, the Board Chairman asked that the evaluation be completed at the earliest date possible and stated that "it was up to the [NRC] Staff to move as quickly as they can in the matter." (Transcript at 1946.) On January 27, we began the current refueling outage and anticipate startup of Cycle 6 on March 12 or 13. In view of the current coal situation and the reduction in fuel charges to our customers once the uprating is obtained, we urge you to avoid the risk of additional unnecessary delays by separating any general rereview from approval of the pending uprating to 2300 MWt.

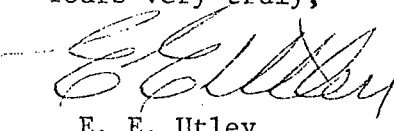
The Company has been given no explanation of NRC's reasons for rereview of offsite dose calculations at this time, and it is our understanding that the NRC branch conducting this review is uncertain of what analysis techniques will be utilized. While we are committed to assuring that all operations are performed safely and in accordance with all appropriate regulations, we are also seriously concerned about your ability to expeditiously complete your rereview in a timely fashion.

February 6, 1978

Your staff was informed early last fall that issuance of the necessary EPA permit was imminent, but apparently took no action with regard to confirming the validity of their completed safety evaluation at that time. It is, therefore, disconcerting that the Staff may be contemplating the necessity of completing this more generic rereview as a condition to confirming their previous approval of the uprating when such general rereviews are routinely conducted by your staff outside the context of any particular licensing activity. In keeping with this, we see no reason why a general rereview, if necessary at all, could not be more effectively conducted independently of the uprating. In any event, we would appreciate receiving from you the date the NRC Staff first determined the need to rereview the offsite accident dose calculations prior to authorizing the uprating to 2300 MWt, and the bases for requiring this rereview. We would also like to know what other plants have undergone a similar rereview. In addition, we would also appreciate you providing us with the NRC schedule for requesting additional information and for completion of your rereview and submittal of appropriate documents to the Atomic Safety and Licensing Board.

Your cooperation in responding to the above request will be greatly appreciated.

Yours very truly,



E. E. Utley
Senior Vice President
Power Supply

DLB/mf

cc: Dr. A. Dixon Callihan
Dr. Richard F. Cole
John F. Wolf, Esq.

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