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 AUTH.NAME AUTHOR AFFILIATION
 UTLEY,E.E. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Responds to 840221 order directing util to implement
 specific items & to submit info re emergency response
 capability (ERC).NUREG-0737,Suppl 1 compliance submittal
 encl.

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Carolina Power & Light Company

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E. E. UTLEY

Executive Vice President

Power Supply and Engineering & Construction

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
RESPONSE TO ORDER CONFIRMING COMMITMENTS ON
EMERGENCY RESPONSE CAPABILITY

Dear Mr. Varga:

SUMMARY

Your letter of February 21, 1984 transmitted an "Order Confirming Licensee Commitments on Emergency Response Capability." The Order directed that Carolina Power & Light Company (CP&L) implement specific items no later than dates delineated in the Order; further, certain information was required to be submitted regarding the emergency response capability (ERC) at the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2). This letter comprises the Company's response to the Order and transmits the required submittals.

DISCUSSION

Attached is an integrated Emergency Response Capabilities Level 1 schedule with supplemental documentation. Each item is discussed below.

1. SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

- a. The required Safety Analysis and Implementation Plan are included under Tab A. A copy of our Systems Overview Document, Revision C, is also included.
- b. The schedule shows SPDS equipment functional 6 months after refueling outage 10 (scheduled to begin in November 1985). Functionality is defined as system installation and field performance test complete. The SPDS system is planned to be

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fully operational one year after refueling outage 10. This schedule allows 6 months for final system checkout and training. An additional modification (807D) is shown on the schedule as occurring during refueling outage 11. This modification does not affect the operability of the SPDS and is shown on the schedule for internal planning purposes.

2. DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

- a. The required Program Plan is included under Tab B.
- b. The schedule shows completion of the DCRDR portion of the emergency response capabilities effort 6 months after refueling outage 10 (scheduled to begin November 1985). The conduct of the review will be undertaken concurrently with ERC modifications to expedite completion of this effort. The significance of changes during outage 10 would make earlier review ineffective.

The Company will submit a summary report and an implementation schedule for Human Engineering Deficiency corrective actions 6 months after refueling outage 10.

3. REGULATORY GUIDE 1.97 - APPLICATION TO EMERGENCY RESPONSE FACILITIES

- a. The report documenting our plans for compliance with Regulatory Guide 1.97 (RG 1.97) is included under Tab C.
- b. Full compliance with RG 1.97 is scheduled for 3 months after refueling outage 11 (scheduled to begin March 11, 1987). The Level 1 schedule tracks the HBR2 RG 1.97 effort since its beginning in August 1983. The Company is making a substantial effort to complete RG 1.97 modifications as soon as possible. In fact, all but two modifications are planned to be installed during refueling outage 10. The schedule assumes that acceptable qualification for all items only requiring review of qualification data is realized and that the NRC accepts our assumptions with regard to instrumentation ranges which differ from those specified in RG 1.97. Due to long procurement lead-times, the neutron flux detector modification described on page A-1 of Tab C and the core exit thermocouple modification described on page A-3 of Tab C will not be installed until refueling outage 11.

4. EMERGENCY OPERATING PROCEDURES (EOP)

- a. The Procedure Generation Package portion of the EOP upgrading was submitted by our letter dated July 2, 1984.
- b. The EOPs have been modified to comply with the Westinghouse Owner's Group (WOG) Emergency Response Guidelines (Rev. 1) and training has

been completed. The upgraded EOPs will be in effect during the startup from the steam generator replacement outage. The schedule shows a period in 1987 during which the EOPs will be re-assessed for compliance with the ERC modifications.

5. EMERGENCY RESPONSE FACILITIES (ERF)

- a. Completion of the Technical Support Center is scheduled for 12 months after refueling outage 10 (scheduled to begin November 1985).
- b. The Operations Support Center is fully functional.
- c. Completion of the Emergency Operations Facility is scheduled for 12 months after refueling outage 10.

As shown on the schedule, building construction is complete with construction modifications currently being concluded. The construction modifications consist of completing the installation, testing, and acceptance of HEPA filters, radiation monitors, fire protection system for the computer room, Emergency Diesel Generator and Battery System, and other modifications which support the completion of the facility. The telecommunications for the facility have been installed and are currently operational (with exception of training). The security modifications for the TSC are currently scheduled to be completed in February 1986; however, the facility will be operational without the security modifications upon completion of the necessary training (October 1985). The ERF will be in compliance upon completion of the SPDS task which is scheduled twelve months after refueling outage 10 (scheduled to begin November 1985).

CONCLUSION

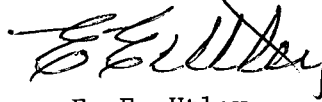
The Company believes that the schedule submitted is realistic and practical. However, the ERC effort has a large scope with several integrated tasks. Our Level 1 Schedule is designed to depict the magnitude and complexities of the effort. The interim milestones shown on the schedule are planning targets for the effective management of a long-term project and will be adjusted as required to meet the completion commitments. Further, completion of the effort is contingent upon installation of equipment during the next two scheduled refueling outages. The dates of the scheduled refueling outages are contingent on capacity factors and forced outages which may require adjustments to the current outage plans. These adjustments have the potential for impacting the scheduled completion dates of the ERC tasks; however, should major changes arise, we will promptly inform you.

Mr. Steven A. Varga

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Questions regarding this matter may be referred to Mr. S. R. Zimmerman at 919-836-6242.

Yours very truly,

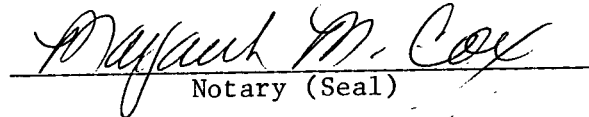


E. E. Utley

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Attachments

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires:

July 4, 1985