

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETING & SERVICE  
BRANCH

In the Matter of )

CAROLINA POWER & LIGHT COMPANY )

(H. B. Robinson Steam Electric  
Plant, Unit 2) )

Docket No. 50-281-OLA

ASLBP No. 83-484-O3LA

\* \* \* \* \*

APPLICANT'S RESPONSES TO LETTER AGREEMENT

\* \* \* \* \*

Dear Mr. Matthews:

Pursuant to the signed letter agreement dated August 1, 1983 between George F. Trowbridge, P.C., Counsel for Applicant, and you as Representative for the Hartsville Group, Applicant herein sets forth its answers pursuant to said agreement:

\* \* \* \* \*

General Interrogatory No. 3 (Calculations)

ANSWER. Applicant presently anticipates that it will rely on the following calculations:

Contention 3

Cost Comparison Report - 15-Year Study.

Applicant has under compilation a report providing in more detail the bases for the cost comparisons furnished to the NRC on July 14, 1983. The report will include a sensitivity analysis of the effect of varying the assumptions in the report as to system load projections and the projected capacity factor and O&M costs for H. B. Robinson 2. A copy of this report will be furnished to the Hartsville Group and the NRC Staff. Applicant anticipates completing this report around September 30, 1983.

PTS Screening Criteria Calculations.

Attached hereto and entitled H. B. Robinson PTS Screening Criteria Calculations are calculations of the length of time before the Robinson 2 vessel will reach the NRC embrittlement criteria based on (a) continued operation with the present Cycle 9 core design and (b) installation of a low flux core design following Cycle 9. The latter calculations assume a flux reduction factor of at least 7. The documents and

DS03

work sheets supporting this factor are available to the Hartsville Group for inspection and copying at CP&L's General Office in Raleigh, NC.

H. B. Robinson 2 FSGRR Repair Program Occupational Exposures.

Estimated occupational exposures during the repair program are listed by repair activities in the FSGRR. A detailed sample calculation for one of the activities is also provided therein for one of the activities.

\* \* \* \* \*

General Interrogatory No. 4 (Communications)

ANSWER. Applicant presently anticipates that it will rely on the following documents:

Contention 1(a) and 1(b)

Corporate Quality Assurance Program Manual, Revision 5 (Blue Book)

Responses to NRC to Notices of Violations.

Contention 3

February 9, 1983, April 1, 1983 letters from CP&L to NRC relative to NRC Pressurized Thermal Shock Screening Criteria

In-Service Inspection Reports

H. B. Robinson 2 SGRR, as revised

H. B. Robinson 2 Updated FSAR

Contention 8

Plans and Specifications for on-site storage building.

\* \* \* \* \*

Contention 1 - Interrogatory No. 31  
(Severity Level IV Violation)

ANSWER. Attached hereto and included as part of attachments marked Attachment HBR Violations, Attachment BSEP Violations, and Attachment SHNPP Violations are copies of the full text of documents previously provided to the Hartsville Group as HBR Attachment 2.a., BSEP Attachment 2.b., and SHNPP Attachment 2.c.

\* \* \* \* \*

Contention 1 - Interrogatory No. 35  
(Violations)

ANSWER. On the bases of a file search, attached hereto are all violations or claims of violations since January 1, 1978, as represented by copies of Applicant's responses identifying and responding to each violation. These copies are marked Attachment HBR Violations, Attachment BSEP Violations, and Attachment SHNPP Violations.

\* \* \* \* \*

Contention 3 - Interrogatory 5  
(Reactor Embrittlement)

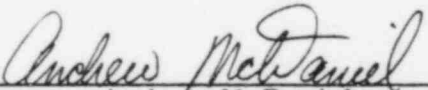
ANSWER. Attached hereto is the letter and its enclosures dated April 1, 1983 from CP&L to the NRC. Said letter is marked Attachment April 1, 1983 Letter.

\* \* \* \* \*

Contention 3 - Interrogatories Nos. 130 through 167  
(Attorney General Interrogatories)

ANSWER. Applicant attaches hereto the affidavit of B. M. Williams stating that the answers provided to the Attorney General's interrogatories were true and correct to the best of affiant's knowledge, information and belief as of June 30, 1983 - the date the same answers were provided to the Hartsville Group, with the exception of the projected schedule of future outages as set forth on pages AG-90 and AG-91 of the Attorney General Attachment, which pages have been revised as indicated on the hereto attached table marked Attachment Revised Pages AG-90 and AG-91. Affiant believes this revision to be true and correct to the best of his knowledge, information and belief.

This 15th day of August, 1983.

  
\_\_\_\_\_  
Andrew McDaniel  
Associate General Counsel  
Carolina Power & Light Company

cc: George F. Trowbridge

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
CAROLINA POWER & LIGHT COMPANY	)	Docket No. 50-261-OLA
	)	
(H. B. Robinson Steam Electric	)	ASLBP No. 83-484-03LA
Plant, Unit 2)	)	

AFFIDAVIT OF B. M. WILLIAMS

WAKE COUNTY       )  
                          )  
NORTH CAROLINA    )

B. M. Williams, being duly sworn according to law, deposes and says that he is Director-Staff Services with Carolina Power & Light Company; that the Answers contained in the ATTORNEY GENERAL ATTACHMENT in Applicant's Answers to the Hartsville Group First Set of Interrogatories to Applicant, Carolina Power & Light Company, were true and correct to the best of his knowledge, information and belief as of June 30, 1983, with the exception of the OUTAGE SCHEDULE FOR 1983, 1984 as contained on pages AG-90 and AG-91 of said ATTORNEY GENERAL ATTACHMENT, and that the sources of his information were officers, employees, agents and contractors of Carolina Power & Light Company; that attached to this Affidavit is a REVISED OUTAGE SCHEDULE FOR 1983, 1984, and that said information contained therein was true

and correct to the best of his knowledge, information and belief as of  
June 30, 1983, and that the sources of his information are officers  
and employees of Carolina Power & Light Company.

*B. M. Williams*

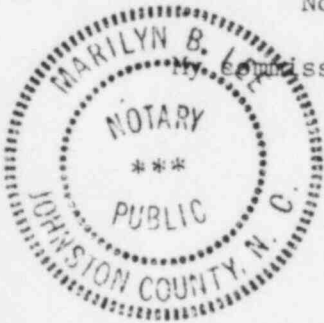
B. M. Williams

Sworn to and subscribed before  
me this 12<sup>th</sup> day of August, 1983.

*Marilyn B. Lee*

Notary Public

My commission expires: 11/15/87



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

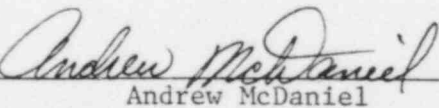
In the Matter of	)	
	)	
CAROLINA POWER & LIGHT COMPANY	)	Docket No. 50-261-OLA
	)	
(H. B. Robinson Steam Electric	)	ASLBP No. 83-484-03LA
Plant, Unit 2)	)	

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance in the above-captioned matter.

In accordance with 10 C.F.R. § 2.713(a), the following information is provided:

Name:	Andrew McDaniel
Address:	Carolina Power & Light Company Post Office Box 1551 Raleigh, North Carolina 27602
Telephone Number:	(919) 836-6513
Admission:	State of North Carolina
Name of Party:	Carolina Power & Light Company
Respectfully submitted.	



Andrew McDaniel

Associate General Counsel  
Carolina Power & Light Company

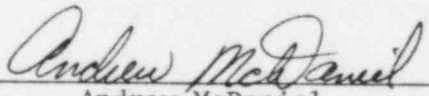
Dated this 15th day of August, 1983

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
CAROLINA POWER & LIGHT COMPANY	)	Docket No. 50-261-OLA
	)	
(H. B. Robinson Steam Electric	)	ASLBP No. 83-484-03LA
Plant, Unit 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "APPLICANT'S RESPONSES TO LETTER AGREEMENT" and a "NOTICE OF APPEARANCE" for Andrew McDaniel in the above-captioned proceeding have been served this 15th day of August, 1983 by depositing in the United States Postal Service, first class, postage prepaid, to the parties on the attached SERVICE LIST. Copies of ATTACHMENTS referred to in said RESPONSES are attached only to Mr. Matthews' copy, Dr. Ruoff's copy, and Mr. Karman's copy.

  
\_\_\_\_\_  
Andrew McDaniel  
Associate General Counsel  
Carolina Power & Light Company

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CAROLINA POWER & LIGHT COMPANY	)	Docket No. 50-261-OLA
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(H. B. Robinson Steam Electric	)	ASLBP No. 83-484-03LA
Plant, Unit 2)	)	

SERVICE LIST

Administrative Judge Morton B. Margulies  
Chairman, Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge Jerry R. Kline  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge David L. Hetrick  
Atomic Safety and Licensing Board  
Professor of Nuclear Engineering  
University of Arizona  
Tucson, Arizona 85721

Docketing & Service Section (3)  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Myron Karman, Esquire  
Office of Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing Appeal  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

B. A. Matthews  
Hartsville Group  
P. O. Box 1089  
Hartsville, South Carolina 29550

Dr. John C. Ruoff  
P. O. Box 96  
Jenkinsville, South Carolina 29065