



Carolina Power & Light Company

SERIAL: NLS-84-138

MAR 30 1984

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
RESPONSE TO IEB 83-08

Dear Mr. O'Reilly:

SUMMARY

In the Inspection and Enforcement Bulletin (IEB) 83-08, NRC requested that Carolina Power & Light Company (CP&L) provide information pertaining to operation of circuit breakers with undervoltage trip attachments (UVTAs) used in safety related applications other than as reactor trip breakers (RTBs) at the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2). Carolina Power & Light Company has reviewed this Bulletin and provides the following response.

BACKGROUND

Issued December 28, 1983, IEB 83-08 required that CP&L identify safety related applications of the breakers and the systems in which they are used; review their design, testing, and maintenance adequacy in light of their operating experience and information in IEB 83-08; and evaluate the need for corrective actions.

DISCUSSION

The safety related breakers other than the RTBs used at HBR2 are the breakers on Emergency Buses E1 and E2 for safety related pumps and fans, and the molded breakers on Motor Control Center MCC-5, 6, 9, and 10 for valves of safety related systems. Emergency buses E1 and E2 use external undervoltage relays which are not a part of the breakers, and some of the breakers on MCC-5, 6, 9, and 10 have encased undervoltage relays. These relays are not similar to the UVTAs described in IEB 83-01 and 83-04 and are not considered within the scope of 83-08. It should be noted that these undervoltage relays have not had reliability problems.

The non-safety related Dedicated Shutdown (DS) System contains DS-416 and DS-332 breakers which have UVTAs. The design criteria for these breakers do not take credit for their automatic action, and HBR2 procedures require that they are verified open prior to energizing the DS system bus. Carolina Power & Light Company is aware that other plants are modifying DS-416 UVTAs used for RTBs; and although these breakers are used only in a non-safety related system at HBR2, CP&L has ordered replacement UVTAs for them.

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James P. O'Reilly

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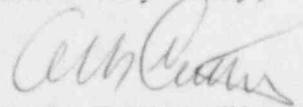
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CONCLUSION

Carolina Power & Light Company has determined that circuit breakers with UVTAs as described in IEB 83-01 and 83-04 are not used in safety related systems other than as RTBs at HBR2. Therefore, other actions required by IEB 83-08 are not applicable. This response provides the report of CP&L's actions as required in the Bulletin.

As requested, CP&L estimates the staff time required to prepare this response to be 100 hours. If you have any questions concerning this response, please contact a member of our Nuclear Licensing Unit staff.

Yours very truly,



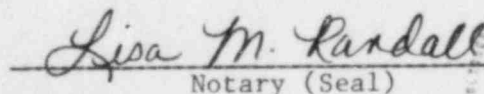
A. B. Cutter, Vice President
Nuclear Engineering & Licensing

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cc: Mr. J. P. O'Reilly (NRC-R11)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)

A. B. Cutter, 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.

My commission expires: 5/18/88


Notary (Seal)

