



**Carolina Power & Light Company**

Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

Serial: RNP-RA/00-0135

**JUL 31 2000**

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

SCHEDULE FOR RESPONSE TO SANDIA NATIONAL LABORATORIES  
REPORT JCN-W-6733 AND SECY-99-182, "ASSESSMENT OF THE IMPACT OF  
APPENDIX R FIRE PROTECTION EXEMPTIONS ON FIRE RISK" (TAC NO. MA8456)

Ladies and Gentlemen:

By letter dated April 25, 2000, the NRC requested that H. B. Robinson Steam Electric Plant, Unit No. 2, (HBRSEP) provide a date for completion of review and comment on a Sandia National Laboratories (SNL) limited-scope study on the fire risk impact of Appendix R exemptions at HBRSEP. On May 30, 2000, HBRSEP submitted a request for an additional 60 days to evaluate this SNL report and possible approaches for providing comments on the data assumptions and conclusions of the study.

Carolina Power and Light (CP&L) Company has completed a preliminary review of the SNL report supporting development of a plan and schedule for providing comments. Based upon this review, CP&L intends to provide comments to the NRC on or before January 25, 2001.

CP&L's preliminary review of the SNL report also identified concerns regarding the approach and conclusions associated with this contractor review of HBRSEP Appendix R exemptions. The application of risk insights to existing exemptions may present opportunities to enhance existing or proposed regulations, however, this effort should not be permitted to supersede or supplant existing regulatory processes. Each HBRSEP Appendix R exemption was developed, reviewed, and approved using a sound technical and deterministic approach in accordance with existing regulations. Approval of each HBRSEP Appendix R exemption, pursuant to 10 CFR 50.12, required a finding of no undue risk to the public health and safety, and that each exemption was consistent with the common defense and security.

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The conclusions of the SNL report were primarily based on risk information developed and submitted in support of the Individual Plant Examinations for External Events (IPEEE) program. As indicated within Section E.8 of the SNL report, use of IPEEE insights for a cumulative assessment of Appendix R exemptions goes beyond the original intent of the IPEEE and is identified as a key limitation of this scoping study. Given the limitations stated within the SNL report, there appears to be insufficient information to conclude that the cumulative risk impact of HBRSEP Appendix R exemptions is potentially risk significant.

Should you have any questions regarding this matter, please contact Mr. Harold Chernoff at (843) 857-1437.

Sincerely,

A handwritten signature in black ink that reads "R. L. Warden FOR R. L. W." The signature is written in a cursive style.

R. L. Warden  
Manager - Regulatory Affairs

CTB/ctb

c: NRC Resident Inspector, HBRSEP  
L. A. Reyes, NRC Region II  
R. Subbaratnam, NRC, NRR