



**Carolina Power & Light Company**  
Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville SC 29550

Serial: RNP-RA/00-0175

**JAN 25 2001**

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

COMMENTS ON NRC SAFETY EVALUATION DATED APRIL 18, 2000

Ladies and Gentlemen:

This letter provides comments and clarifications regarding the NRC Safety Evaluation and Technical Evaluation Report issued with Amendment No. 187 to the HBRSEP, Unit No. 2 Facility Operating License dated April 18, 2000. Carolina Power & Light's comments are included in the attachment to this letter.

If you have any questions concerning this matter, please contact Mr. H. K. Chernoff.

Sincerely,

A handwritten signature in black ink, appearing to read "B. L. Fletcher III".

B. L. Fletcher III  
Manager - Regulatory Affairs

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Attachment

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

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**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2**  
**COMMENTS ON NRC SAFETY EVALUATION DATED APRIL 18, 2000**

**Safety Evaluation**

The Safety Evaluation (SE) states the following.

“During a meeting that was held on February 4, 2000, the licensee indicated that the design valve stroke time was 37.02 seconds, and the 50-second closure time accounts for valve stall time and provides additional margin above the design closure time. With changes to the gearing and the motor, the MFIV stroke time will be reduced from 68 seconds to 39.2 seconds. These valves are part of the licensee’s Generic Letter 89-10 program for motor-operated valves.”

**HBRSEP, Unit No. 2 Comment:**

The design stroke time of the main feedwater isolation valves (MFIVs) was changed in refueling outages (ROs) 18 and 19 from 68 seconds to 39.2 seconds in accordance with calculations. The measured actual measured stroke time for one valve, FW-V-2-6B, conducted in RO-18, was 37.02 seconds.

**Technical Evaluation Report**

The Technical Evaluation Report states the following:

“Given a loss of offsite power initiating event, if the temperature of the service water were high enough to cause failure of the diesel generators, then all AC would be lost. Once AC is lost, SW is lost (instead of merely being provided at excessively high temperature). Loss of all AC initiated during power operation would leave at least the steam turbine driven train of AFW potentially operable, provided that its alignment has been changed so that it is self-cooled rather than being cooled by SW (p.3-113).”

**HBRSEP, Unit No. 2 Comment:**

It should be noted that H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 has a dedicated shutdown diesel generator for the purposes of coping with a loss of all on-site and off-site AC power. Additionally, the Auxiliary Feedwater (AFW) Pumps have been permanently aligned to the self-cooling mode eliminating the need for service water.