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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

REVISION TO 10 CFR 50, APPENDIX R SEPARATION ANALYSIS

Ladies and Gentlemen:

Carolina Power & Light (CP&L) Company has completed a review and revision to its 10 CFR 50, Appendix R, Separation Analysis for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The completed analysis has resulted in re-designation of some fire areas formerly designated in the Fire Hazards Analysis as 10 CFR 50, Appendix R, Section III.G.3 areas to Section III.G.2 areas. As a result of this change, NRC granted exemptions from 10 CFR 50, Appendix R, Section III.G.3, are no longer necessary for some re-designated areas, which now are in accordance with 10 CFR 50, Appendix R, Section III.G.2.

A summary of the changes to the Updated Final Safety Analysis Report (UFSAR) Fire Hazards Analysis is provided in the attachment to this letter. These changes have been reviewed in accordance with 10 CFR 50.59 requirements in effect prior to the effective date and implementation of the changes to 10 CFR 50.59 (64 FR 53582) and have been determined to not involve an unreviewed safety question. Details of the changes will be provided in the next revision to the UFSAR.

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

Sincerely,

B. L. Fletcher III
Manager - Regulatory Affairs

ALG/alg

Attachment

c: L. A. Reyes, NRC, Region II
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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Carolina Power & Light (CP&L) Company has revised its 10 CFR 50, Appendix R, Separation Analysis for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The completed analysis has resulted in re-designation of some fire areas formerly designated in the Fire Hazards Analysis as 10 CFR 50, Appendix R, Section III.G.3 areas to Section III.G.2 areas. As a result of this change, NRC granted exemptions from 10 CFR 50, Appendix R, Section III.G.3, are no longer necessary for the areas and zones listed below, which now meet the requirements of 10 CFR 50, Appendix R, Section III.G.2.

The discussion of fire areas and compliance with 10 CFR 50, Appendix R, with exemptions, is found in Updated Final Safety Analysis Report (UFSAR) Section 9.5.1A, Paragraph 3.0, "Fire Area Analysis." Each fire area that no longer has a need to rely upon an exemption from 10 CFR 50, Appendix R, Section III.G, is summarized below with a short discussion of the change.

1. UFSAR Section 9.5.1A, Paragraph 3.1, "Appendix R Fire Area A"

Fire Area A, "General Auxiliary Building Area," is now divided into eight separate fire areas instead of one area. The subdivision of Fire Area A is summarized in Table 1. The separation into eight separate fire areas has permitted the designation of some areas as Section III.G.2 areas rather than Section III.G.3 areas as described below.

a. UFSAR Section 9.5.1A, Paragraph 3.1.21, "Fire Zone 38 - Waste Evaporator Area"

New Fire Area A4 includes Fire Zone 14, "Solid Waste Handling Area," and Fire Zone 38, "Waste Evaporator Area," which is located in the Auxiliary Building at elevation 265 ft. This new fire area is now a Section III.G.2 area. Fire Zone 38 no longer requires exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by NRC letter dated September 17, 1986.

b. UFSAR Section 9.5.1A, Paragraph 3.1.4, "Fire Zone 6 - Auxiliary Feedwater Pump Room"

New Fire Area A6 includes Fire Zone 6 "Auxiliary Feedwater Pump Room," and is located on the ground floor of the Auxiliary Building at elevation 226 ft. This new fire area is now a Section III.G.2 area and no longer requires exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by NRC letter dated September 17, 1986.

c. UFSAR Section 9.5.1A, Paragraph 3.1.9, "Fire Zone 13 – Boric Acid Batch Tank Room"

New Fire Area A7 includes Fire Zone 13 "Chemical Storage Area and Boric Acid Batch Tank Room," and is located on the second floor of the Auxiliary Building at elevation 246 ft. This new fire area is now a Section III.G.2 area and no longer requires exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by NRC letter dated September 17, 1986.

d. UFSAR Section 9.5.1A, Paragraph 3.1.6, "Fire Zone 8 – Boron Injection Tank Room"

New Fire Area A8 includes Fire Zone 8, "Boron Injection Tank Room," and is located on the ground floor of the Auxiliary Building at elevation 226 ft. This Fire Zone is now a Section III.G.2 area and no longer requires exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by the NRC by letter dated September 17, 1986.

e. UFSAR Section 9.5.1A, Paragraph 3.1.7, "Fire Zone 11 – Pipe Alley"

New Fire Area A8 also includes Fire Zone 11, "Pipe Alley," and is located along the west side of the Auxiliary Building ground floor at elevation 226 ft. This Fire Zone is now a Section III.G.2 area and no longer requires exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by NRC letter dated September 17, 1986.

f. UFSAR Section 9.5.1A, Paragraph 3.1.8, "Fire Zone 12 – Waste Holdup Tank, RHR Heat Exchangers"

New Fire Area A8 also includes Fire Zone 12, "Waste Holdup Tank Room and RHR Heat Exchanger Room," and is located on the ground floor of the Auxiliary Building at elevation 226 ft. The Residual Heat Removal (RHR) Heat Exchanger Room extends up to the second floor of the Auxiliary Building. This Fire Zone is now a Section III.G.2 area and no longer requires exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by NRC letter dated September 17, 1986.

2. UFSAR Section 9.5.1A, Paragraph 3.7, "Fire Area G – Exterior Area"

Fire Area G, "Exterior Area" is now divided into four separate fire areas instead of one area. The subdivision of Fire Area G is summarized in Table 2. Fire Area G1 includes the Turbine Building, Dedicated Shutdown Diesel Generator, Yard Transformers, and Condensate Storage Tank. Fire Area G2 includes the Diesel Fuel Oil Storage Tank. Fire Area G3 includes the Service Water Pump area and was already a III.G.2 area. Fire Area G4 includes the Fuel Handling Building, Refueling Water Storage Tank, Primary Water Storage Tank, Battery "C" Enclosure, Radwaste Facility, Radiation Monitoring Room, Purge Inlet Valve Room, and the Unit 2 Oil Unloading/Transfer area. The separation into four separate fire areas has permitted

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the designation of fire areas G1, G2, and G4, and the Zones within, as Appendix R, Section III.G.2 areas rather than Appendix R, Section III.G.3 areas. These four fire areas, and the fire zones within, no longer require exemption from 10 CFR 50, Appendix R, Section III.G.3, as granted by NRC letter dated September 17, 1986.

Table 1
 Division of Fire Area A, "General Auxiliary Building

Fire Area	Fire Zone	Fire Zone Description	Appendix R Category	
			Previous	Current
A1	1	Emergency Diesel Generator "B" Room	III.G.3	III.G.3
A2	2	Emergency Diesel Generator "A" Room	III.G.3	III.G.3
A3	3	Safety Injection Pump Room	III.G.3	III.G.3
	7	Auxiliary Building Hallway (Ground Floor)	III.G.3	III.G.3
A4	14	Solid Waste Handling Room	III.G.3	III.G.2
	38	Waste Evaporator Area	III.G.3	III.G.2
A5	15	Auxiliary Building Second Level	III.G.3	III.G.3
	16	Battery room	III.G.3	III.G.3
	17	Control Room HVAC Equipment Room	III.G.3	III.G.3
	18	Unit 1 Cable Spreading Room	III.G.3	III.G.3
	19	Unit 2 Cable Spreading Room	III.G.3	III.G.3
	20	Emergency Switchgear Room and Electrical Equipment Area	III.G.3	III.G.3
	21	Rod Control Room	III.G.3	III.G.3
	22	Control Room	III.G.3	III.G.3
	23	Hagan Racks Room	III.G.3	III.G.3
	36	Component Cooling Water Surge Tank Room	III.G.3	III.G.3
A6	6	Auxiliary Feedwater Pump Room	III.G.3	III.G.2
A7	13	Chemical Storage Area and Boric Acid Batching Tank	III.G.3	III.G.2
A8	8	Boron Injection Tank Room	III.G.3	III.G.2
	11	Pipe Alley	III.G.3	III.G.2
	12	Waste Holdup Tank and Residual Heat Removal Heat Exchangers	III.G.3	III.G.2

Table 2
 Division of Fire Area G, "Exterior Area"

Fire Area	Fire Zone	Fire Zone Description	Appendix R Category	
			Previous	Current
G1	25A, 25B, 25C, 25E, 25F, 25G	Turbine Building	III.G.3	III.G.2
	25D	Dedicated Shutdown Diesel Generator	III.G.3	III.G.2
	26	Yard Transformers	III.G.3	III.G.2
	33	Condensate Storage Tank	III.G.3	III.G.2
G2	30	Diesel fuel Oil Storage Tank	III.G.3	III.G.2
G3	29	Service Water Pump Area	III.G.2	III.G.2
G4	28A, 28B, 28C, 28D, 28E, 28F	Fuel Handling Building	III.G.3	III.G.2
	31	Refueling Water Storage Tank	III.G.3	III.G.2
	32	Primary Water Storage Tank	III.G.3	III.G.2
	34	Battery "C" Enclosure	III.G.3	III.G.2
	35	Radwaste Facility	III.G.3	III.G.2
	37	Radiation Monitoring Room	III.G.3	III.G.2
	39	Purge Inlet Room	III.G.3	III.G.2
	40	Unit 2 Fuel Oil Unloading/Transfer Area	III.G.3	III.G.2