

September 5, 2001

Mr. J. W. Moyer, Vice President  
Carolina Power & Light Company  
H. B. Robinson Steam Electric Plant,  
Unit No. 2  
3581 West Entrance Road  
Hartsville, South Carolina 29550

SUBJECT: H. B. ROBINSON ELECTRIC PLANT, UNIT 2 (HBRSEP2) RE: 10 CFR PART 50  
APPENDIX R SEPARATION ANALYSIS AND FIRE PROTECTION EXEMPTIONS

Dear Mr. Moyer:

In a letter dated May 31, 2001, Carolina Power & Light Company (CP&L) notified the NRC that the completion of an analysis had resulted in re-designation of some fire areas formerly designated in the Fire Hazard Analysis as Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix R, Section III.G.3 areas to Section III.G.2 areas. CP&L had indicated in the letter that as a result of these findings, NRC-granted exemptions from 10 CFR Part 50, Appendix R, Section III.G.3, are no longer necessary for some redesignated areas that, according to CP&L, are now in compliance with 10 CFR Part 50, Appendix R, Section II.G.2. A summary of the changes and Updated Final Safety Analysis Report (UFSAR) Fire Hazard Analysis was provided as an attachment to the referenced letter. NRC was not provided with the 10 CFR Section 50.59 review and supporting documents. The licensee stated that details of these changes will be provided in the next revision of the UFSAR.

In a telephone conversation on August 13, 2001, CP&L personnel clarified that the intent of the letter was only to share review findings with NRC, and no licensing action was anticipated from NRC. Furthermore, it was confirmed that the May 31, 2001, letter was not a request to NRC for partial revocation of any previously authorized exemptions to 10 CFR Part 50, Appendix R, Section III.G.3.

Pursuant to the August 13, 2001, clarification, it is understood that NRC is not pursuing any licensing actions related to 10 CFR Part 50, Appendix R, Section III.G.3 exemptions. Please be advised that re-designated fire areas subjected to corrective actions/alterations or deletion of administrative procedures, if any, may be the subject of future NRC inspection/approval.

If you have any questions, please contact me on (301) 415-1478.

Sincerely,

**/RA by U. Bhachu Acting for/**  
Ram Subbaratnam, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-261

cc: See next page

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