



Serial: RNP-RA/03-0093

JUL 24 2003

United States Nuclear Regulatory Commission  
Attn: Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T-6D 59  
Washington, DC 20555-0001

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

COMMENTS ON  
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Dear Sir:

By letter dated June 14, 2002, Carolina Power & Light (CP&L) Company, now doing business as Progress Energy Carolinas, Inc. (PEC), submitted an application for renewal of the Operating License for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

As part of the review of the application, the NRC has published a draft plant-specific supplement (i.e., Supplement 13) to the Generic Environmental Impact Statement, NUREG-1437. PEC has reviewed the draft supplement and provides specific comments from this review in the attachment to this letter.

If you have any questions concerning this matter, please contact me.

Sincerely,

C. T. Baucom  
Supervisor - Licensing/Regulatory Programs

JSK/jsk

Attachment

Progress Energy Carolinas, Inc.  
Robinson Nuclear Plant  
3581 West Entrance Road  
Hartsville, SC 29550

*Attachment = ADM-013*

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Rules and Directives

*3/14/03*

*68 FR 25907*

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*E-RFDS = ADM-03  
All = R. FUCH (PLE)*

**United States Nuclear Regulatory Commission**

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**c: Mr. T. P. O'Kelley, Director, Bureau of Radiological Health (SC)  
Mr. L. A. Reyes, NRC, Region II  
Mr. C. P. Patel, NRC, NRR  
NRC Resident Inspectors, HBRSEP  
Attorney General (SC)  
Mr. S. K. Mitra, NRC, NRR  
Mr. R. L. Emch, NRC, NRR  
Mr. R. M. Gandy, Division of Radioactive Waste Management (SC)**

### Comments on Draft Supplemental Environmental Impact Statement

Location	Comment
Page 2-6, lines 1-7.	Note that the power uprate license amendment discussed in this paragraph has been approved by NRC letter dated November 5, 2002.
Page 2-19, line 9.	Hurricane Hugo occurred in September 1989, rather than September 1998.
Page 4-17, line 18.	There appears to be an error in the conversion from metric to English units.
Page 4-22, lines 25-28.	The National Electric Safety Code (NESC) vertical clearance requirement is 22.4 feet; Progress Energy maintains a 27 foot vertical clearance requirement for possible errors during construction.
Page 4-22, lines 28-30.	The statement is made that the utility did not do any specific modeling or experimental studies to determine if induced currents would exceed requirements established in the NESC. Refer to section 4.13 of the Environmental Report, submitted by letter dated June 14, 2002, for a description of modeling that was performed.
Page 4-32, section 4.4.5.	The recommendation that forested areas within the exclusion zone should be treated as having moderate-to-high potential for historic or archaeological resources should be deleted. Statements in section 2.2.9.2 indicate that a farm was formerly located at the plant site, but that "[a]ny structures that were part of the farm have been destroyed." This and other statements in sections 2.2.9.2 and 4.4.5 do not support the characterizations of moderate-to-high potential, and do not support expansion of the recommendation beyond the exclusion area to the rest of a site that is shared by coal- and gas-fired plants.
Page 4-41, line 40, and page 4-42, lines 1-2.	Note that Black Creek is a tributary of the Pee Dee River.
Page 8-8, line 21, page 8-25, line 39, and elsewhere in the report.	Note that the plant's maximum dependable capacity has been revised to 710 MW(e).
Page 8-48, section 8.2.5.10.	There are currently no generating plants planned for retirement.
Page 8-48, lines 36-41.	The data provided for demand-side management savings are for the Company's South Carolina service area.
Page 9-6, lines 13 and 18.	In line 13, the word "reactors" should be singular. In line 18, the term "in each of the two units" should be revised to "in the reactor."