

December 30, 2003

MEMORANDUM TO: Edwin M. Hackett, Project Director
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Pao-Tsin Kuo, Program Director */RA/*
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

SUBJECT: COST-BENEFICIAL SEVERE ACCIDENT MITIGATION ALTERNATIVES
(SAMA) IDENTIFIED DURING THE LICENSE RENEWAL REVIEW FOR
H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

The License Renewal and Environmental Impacts Program is referring the two cost-beneficial SAMAs that were identified during the environmental portion of the license renewal review for the H.B. Robinson Steam Electric Plant, Unit 2 (Robinson) to Project Directorate II for resolution. Chapter 5 and Appendix G of the attached NUREG 1437 "Supplement 13, to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Regarding H.B. Robinson Steam Electric Plant, Unit No. 2" (SEIS) contain the analysis that identified the two cost-beneficial SAMAs. These two cost-beneficial SAMAs are not related to aging management and, therefore, were not within the scope of 10 CFR Part 54, the license renewal rule. Since the SAMAs were not within the scope of the license renewal rule, the staff did not require Carolina Power and Light Company (CP&L), the licensee for Robinson, to implement the cost-beneficial SAMAs during license renewal. CP&L has not committed to implement these two SAMAs. However, CP&L has indicated informally that these two SAMAs have been placed on a list of potential plant modifications and are scheduled to be considered for implementation at Robinson.

The cost beneficial SAMAs that were identified during the review are:

- Replacement of the cast-iron yokes on two residual heat removal system (RHR) valves with materials that would have a greater capability to withstand seismic activity.
- Installation of a radiant heat shield on the electrical conduit to the shutdown diesel generator.

These two SAMAs were not identified by CP&L; they were identified by the Probabilistic Safety Assessment Branch during review of the SAMA analysis presented by CP&L in the license renewal application for Robinson. In the SEIS, the staff concluded that these two SAMAs are cost-beneficial. The RHR valve yoke replacement was judged cost-beneficial depending on the assumed seismic hazard estimates and the particular outage in which the modification would be installed. There were no caveats on the staff's cost-beneficial conclusion in the SEIS for the radiant heat shield.

E. Hackett

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Mr. Robert Palla of the Probabilistic Safety Assessment Branch (SPSB) performed the review and should be consulted for any additional information regarding the cost-beneficial SAMAs. If you have any other questions concerning this matter, please contact the environmental project manager for the Robinson license renewal project, Rich Emch, at 301-415-1590.

Docket No.: 50-261

Attachment:
Supplement 13 to NUREG-1437, **(ML033430375)**

cc: w/o attachment

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1. Memo to E. Hackett w/Svc. List: **ML040050412**
2. Supplement 13 to NUREG-1437): **ML033430375**

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