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72-1004



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MAR 22 2005

Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

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

SCHEDULE INFORMATION RELATED TO
TRANSNUCLEAR, INC., CERTIFICATE OF COMPLIANCE NO. 1004, AMENDMENT NO. 8

Ladies and Gentlemen:

This letter provides information that may be useful in establishing the priority for processing the 10 CFR 72.214 rulemaking necessary to incorporate Amendment No. 8 to Certificate of Compliance No. 1004 for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel, Docket Number 72-1004.

In a letter dated March 14, 2005, Progress Energy Carolinas, Inc. (PEC), also known as Carolina Power and Light Company, informed the NRC of the intent to store irradiated fuel in an Independent Spent Fuel Storage Installation (ISFSI) at the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, site, under a general license using the NUHOMS[®] system, beginning in July 2005.

HBRSEP, Unit No. 2, is currently scheduled to begin Refueling Outage 23 (RO-23) on September 17, 2005. During RO-23, 56 irradiated fuel assemblies will be removed from the core for storage in the spent fuel pool. Due to the addition of these 56 assemblies to the spent fuel pool, upon restart from RO-23 in October 2005, PEC will no longer have the ability to offload a full core of 157 fuel assemblies to the spent fuel pool. This could significantly impact the ability of PEC to provide reliable electric power to its customers.

In order to avoid this potential impact, PEC plans to transfer 96 spent fuel assemblies (four dry storage casks of 24 assemblies each) from the current spent fuel pool inventory to the planned ISFSI prior to RO-23. Due to the high burnup of the fuel remaining in the HBRSEP, Unit No. 2, spent fuel pool, PEC has chosen the NUHOMS[®]-24PTH dry cask storage system. Incorporation of Amendment No. 8 to Certificate of Compliance No. 1004 into 10 CFR 72.214 is required to make the NUHOMS[®]-24PTH system available for use under a general license.

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

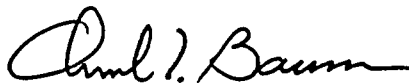
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The planned transfer of the 96 fuel assemblies prior to RO-23 must be completed by September 4, 2005. After this date, resources, including personnel and equipment, will be dedicated to RO-23 preparations and will not be available for fuel transfer operations. In order to load and transfer four casks to the ISFSI by September 4, 2005, loading activities for the first cask must begin by August 8, 2005. Prior to the first cask loading, a period of ten days is required after final rule issuance to make necessary changes to documentation (e.g., procedures and engineering documents) for which final approval is contingent upon the rule change. Therefore, the effective date for the final rule change to 10 CFR 72.214 that incorporates Amendment No. 8 needs to be no later than July 29, 2005 to support the PEC plans.

In addition to the potential impact associated with full core offload capability, there would also be a cost impact associated with a delay in any transfer operations until after RO-23. PEC has currently scheduled personnel, training, and rented equipment to support dry runs, including an NRC observed dry run, during the June/July 2005 time period, to be followed directly by the planned dry cask loading. If the loading and transfer of four casks by September 4, 2005 cannot be accomplished, then PEC would have to reschedule and remobilize the personnel and equipment some time after RO-23.

Your consideration of this information is appreciated. If you have any questions concerning this matter, please contact me at 843-857-1253.

Sincerely,



C. T. Baucom
Supervisor – Licensing/Regulatory Programs

RAC/rac

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