



Serial: RNP-RA/06-0101

**NOV 20 2006**

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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

RESPONSE TO NRC REQUEST FOR  
ADDITIONAL INFORMATION REGARDING PROPOSED  
TECHNICAL SPECIFICATIONS CHANGE TO SECTION 3.5.2

Ladies and Gentlemen:

In a letter dated June 1, 2006, Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), requested NRC review and approval of a change to the surveillance requirement for the containment sump as described in Technical Specifications Section 3.5.2 for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. An NRC request for additional information (RAI) pertaining to this amendment request was received by electronic mail transmission dated September 11, 2006. Attachment II to this letter provides the response to the RAI.

Attachment I provides an Affirmation in accordance with the provisions of 10 CFR 50.30(b).

If you have any questions concerning this matter, please contact Mr. C. T. Baucom at (843) 857-1253.

Sincerely,

A handwritten signature in cursive script that reads "Jan F. Lucas".

Jan F. Lucas  
Manager – Support Services – Nuclear

United States Nuclear Regulatory Commission

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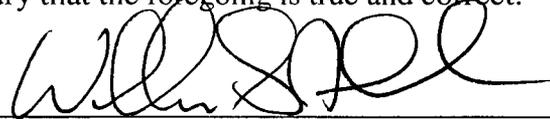
Attachments: I. Affirmation  
II. Response to NRC Request for Additional Information Regarding Proposed  
Technical Specifications Change to Section 3.5.2

c: Dr. W. D. Travers, NRC, Region II  
Mr. C. P. Patel, NRC, NRR  
NRC Resident Inspector

**AFFIRMATION**

The information contained in letter RNP-RA/06-0101 is true and correct to the best of my information, knowledge and belief; and the sources of my information are officers, employees, contractors, and agents of Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: November 20, 2006



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William G. Noll  
Director - Site Operations  
HBRSEP, Unit No. 2

## **H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2**

### **RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED TECHNICAL SPECIFICATIONS CHANGE TO SECTION 3.5.2**

The following responses are provided for the NRC request for additional information (RAI) that was received by an electronic mail transmission dated September 11, 2006:

#### **NRC Request 1:**

Identify the scope of the containment sump suction inlet periodic inspection required by Surveillance Requirement 3.5.2.6, including a list of the components and/or structures covered by the inspection for potential debris restrictions.

#### **Response:**

The scope of the containment sump suction inlet periodic inspection required by Surveillance Requirement (SR) 3.5.2.6, as proposed in the license amendment request dated June 1, 2006, is the containment sump suction inlet and the sump suction strainers. As shown in Figure 1 provided in this RAI response, the sump suction inlet and strainer is composed of a manifold with the strainer assemblies attached. Therefore, the scope of the proposed SR 3.5.2.6 inspection is the strainer and the strainer manifold.

The scope of the current SR 3.5.2.6, as implemented by procedure EST-139, "ECCS [Emergency Core Cooling System] Containment Sump Inspection," includes inspection of the ECCS containment sump inlet, coarse filtration screens, and ECCS sump hood.

The current and proposed surveillances are visual inspections of the external surfaces, which is consistent with the current method for conducting this surveillance.

#### **NRC Request 2:**

State the current licensing basis functions of the existing trash rack and explain how they will continue to be accomplished by the planned replacement strainer prior to the adoption of a mechanistic licensing basis with regard to post-accident debris in response to Generic Letter 2004-02.

#### **Response:**

The current licensing basis function for the existing trash rack, as stated in the HBRSEP, Unit No. 2, Updated Final Safety Analysis Report (UFSAR), is described as follows:

"Staged debris removal of the water entering the RHR [Residual Heat Removal] Pump suction piping during the recirculation mode is accomplished as follows:  
(Refer to Figure 6.3.2-3 and Containment Spray Flow Diagram)

1. Debris approximately 1" and above is stopped by the coarse screens located at the base of the shield wall inside the Reactor Coolant Pump Bays. These screens have openings approximately 1".

The coarse filtration screens are considered to be the "trash rack" portion of SR 3.5.2.6. These coarse filtration screens do not provide any other function for ECCS sump operability.

Based on the evaluation performed in support of the containment sump modification, scheduled to be installed during the next refueling outage, the coarse filtration function is no longer needed.

**NRC Request 3:**

State whether the 1/2-inch mesh "prescreen" referred to in UFSAR Section 6.3.2.2.2 is the "trash rack" referred to in SR 3.5.2.6. If the "trash rack" referred to in SR 3.5.2.6 is a different component or structure, please provide a basic description of this component, including its surface area, mesh size, and location in containment.

**Response:**

The information in Section 6.3.2.2.2 of the UFSAR states, "Neutral and near neutral buoyant debris greater than 7/32" diameter are stopped by the sump screens. The screens consist of a prescreen with a 1/2" square mesh opening in series with a 7/32" square mesh opening screen. This prescreen reduces the debris loading on the final screen." The 1/2 inch square mesh screens are not considered to be trash racks. They are considered to be part of the screens at the sump inlet. The coarse screens at the base of the shield wall, described in response to NRC Request 2, are considered to be the trash racks. These trash racks are shown on Figure 2 and have an approximate 1 inch mesh size. The trash racks are mounted on an approximate 45 degree angle and have approximate dimensions of 4.24 feet wide by 141.4 feet long, which results in approximately 600 square feet of surface area.

Figure 1: Planned Strainer Configuration

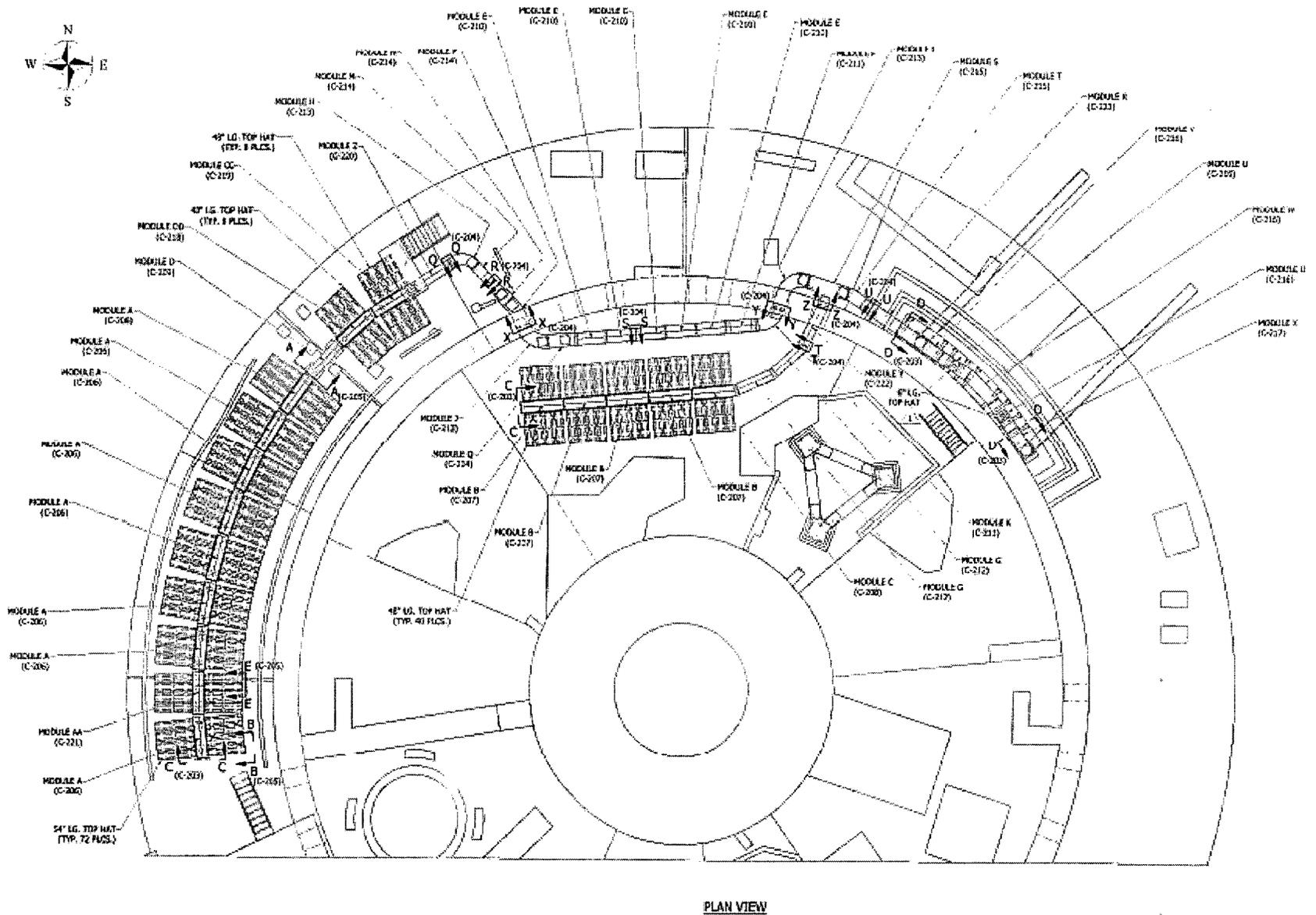
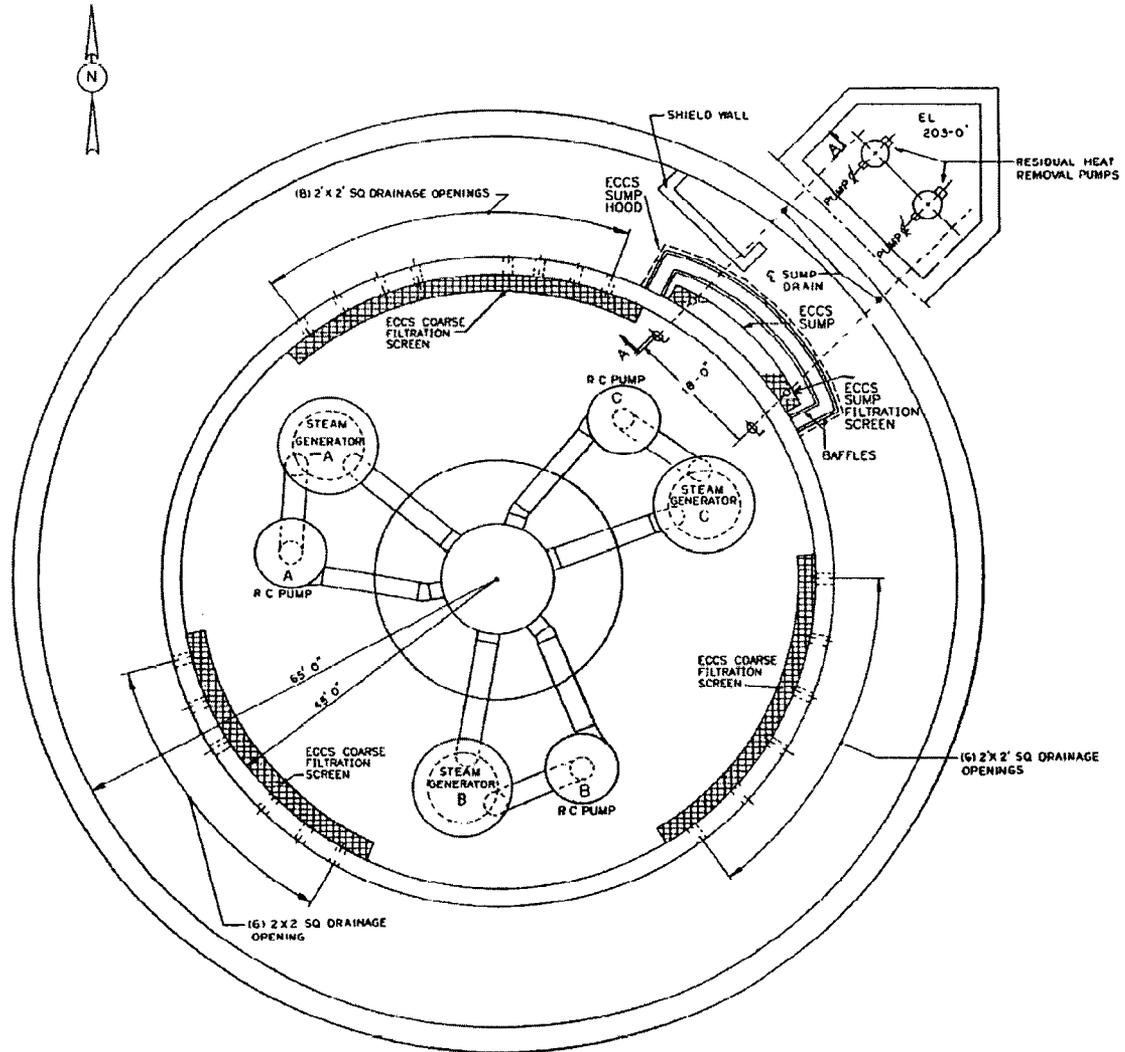


Figure 2: Current Sump Configuration





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Dr. William D. Travers  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission - Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street S.W., Suite 23T85  
Atlanta, Georgia 30303-8931

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

REACTOR AND SENIOR REACTOR OPERATOR INITIAL EXAMINATION OUTLINES

Dear Dr. Travers:

In response to NRC letter dated November 9, 2006, Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc., has submitted the requested examination outlines to your staff for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The reactor and senior reactor operator initial examination outlines were mailed directly to Mr. Rick Baldwin on November 16, 2006.

If you have any questions concerning this matter, please contact Mr. C. T. Baucom at (843) 857-1253.

Sincerely,

A handwritten signature in cursive script that reads 'Jan F. Lucas'.

Jan F. Lucas  
Manager - Support Services - Nuclear

JFL/cac

c: Document Control Desk  
NRC Resident Inspector, HBRSEP  
Mr. C. P. Patel, NRC, NRR  
Mr. M. E. Ernstes, NRC, Region II

Progress Energy Carolinas, Inc.  
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