



Serial: RNP-RA/07-0118

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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 PERTAINING TO PROPOSED TECHNICAL SPECIFICATIONS
CHANGES REGARDING CONTROL ROOM HABITABILITY (TAC NO. MD6117)

Ladies and Gentlemen:

In a letter dated July 17, 2007, Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), requested NRC review and approval of changes to modify the Technical Specifications (TS) requirements related to control room habitability 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 in a letter dated October 10, 2007. 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 me at (843) 857-1253.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. T. Baucom'.

C. T. Baucom
Manager – Support Services – Nuclear

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Attachments: I. Affirmation


II. Response to NRC Request for Additional Information Pertaining to Proposed
Technical Specifications Changes Regarding Control Room Habitability

c: Dr. W. D. Travers, NRC, Region II
Ms. M. Vaaler, NRC, NRR
NRC Resident Inspector, HBRSEP

AFFIRMATION

The information contained in letter RNP-RA/07-0118 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: 11/9/07


T. D. Walt
Vice President, HBRSEP, Unit No. 2

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

**RESPONSE TO NRC REQUEST FOR ADDITIONAL
INFORMATION PERTAINING TO PROPOSED TECHNICAL
SPECIFICATIONS CHANGES REGARDING CONTROL ROOM HABITABILITY**

The following responses are provided for the NRC request for additional information dated October 10, 2007:

NRC Request 1:

What is the maximum time between CRE [Control Room Envelope] integrity inleakage testing that will be permitted based on the two inleakage tests and the plant-specific evaluation you plan to perform?

Response 1:

The Control Room Envelope Habitability Program will specify the evaluations necessary to extend the test frequency beyond the six-year interval specified in the industry guidance. Such evaluations will include the repeatability of past tests (both plant specific and industry results), the margin between measured results and the inleakage rates assumed in dose analyses, modifications and maintenance performed to the habitability envelope, and results of positive pressure tests and visual inspections. The Control Room Envelope Habitability Program will specify a maximum interval of 12 years.

NRC Request 2:

Regulatory Guide 1.197 provides for CRE integrity testing using methods other than ASTM E741. ASTM E741 provides flexibility for the tracer gas testing method. Please indicate what deviations to ASTM E741 are anticipated that are not applicable to the current version of ASTM E741, or the methods covered by Regulatory Guide 1.197.

Response 2:

NEI 99-03, Revision 1, "Control Room Habitability Guidance," states that vendors have traditionally taken exceptions to the standard in developing their own testing protocols. NEI 99-03, Revision 1, Appendix EE, discusses exceptions typically taken by ASTM E741 test vendors. The exceptions listed in Appendix EE provide examples of the type of exceptions that will be allowed by the proposed Control Room Envelope Habitability Program. As stated in proposed Technical Specifications 5.5.17.c.2, the Control Room Envelope Habitability Program will require exceptions to the test methodology to be documented in the individual test report.