



Serial: RNP-RA/08-0014

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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

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

THREE MONTH RESPONSE TO NRC GENERIC LETTER 2008-01,
"MANAGING GAS ACCUMULATION IN EMERGENCY CORE
COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS"

Ladies and Gentlemen:

NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008, requests that the licensee provide a response within nine months. If the licensee cannot meet the requested response date, the licensee shall provide a response within three months that describes an alternative course of action. A 30-day extension for the three month response was granted on April 3, 2008, by telephone conversation between Jared Wermiel (Deputy Director, Division of Safety Systems, NRR) and Brian McCabe (Manager, Nuclear Regulatory Affairs, Progress Energy). Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc., is providing the information requested for the three month response for H. B. Robinson Steam Electric Plant, Unit No. 2, in Attachment II to this letter. This includes the following commitment:

"A response to GL 2008-01 detailing the results of our actions will be provided within six months following the completion of Refueling Outage (RO)-25, scheduled to end on November 2, 2008."

Attachment I provides an Affirmation in accordance with the provisions of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f).

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

A134
NRR

If you have any questions concerning this matter, please contact Mr. C. A. Castell at (843) 857-1626.

Sincerely,



Charles T. Baucom
Manager – Support Services – Nuclear

CTB/ahv

Attachments:

- I. Affirmation
- II. Three Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

c: L. A. Reyes, NRC, Region II
M. G. Vaaler, NRC, NRR
NRC Resident Inspector

AFFIRMATION

The information contained in letter RNP-RA/08-0014 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: 5/9/08



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

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

THREE MONTH RESPONSE TO NRC GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS”

Background

NRC Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,” requires that, within nine months of the issuance of the Generic Letter, addressees submit a written response consistent with the requested actions and information. If an addressee cannot meet the requested response date, the addressee shall provide a response within three months of the date of the GL and is requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

The NRC requests that each addressee evaluate its Emergency Core Cooling System (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. In addition, the NRC requests that each addressee provide the following information: (a) A description of the results of evaluations that were performed pursuant to the above requested actions. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems; (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and, (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In a letter from James H. Riley (Nuclear Energy Institute [NEI]) to plant administrative contacts, dated March 20, 2008, NEI provided guidance for developing a three month response to GL 2008-01. The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, response was developed using the NEI guidance letter.

This response will discuss the following items:

- 1) The required evaluations that will not be completed by October 11, 2008.
- 2) The alternative course of action planned; and,
- 3) The basis for the acceptability of the alternative course of action.

Alternative Schedule

Progress Energy Carolinas, Inc. (PEC), will complete detailed walkdowns and any necessary examinations of inaccessible piping within the scope of GL 2008-01. A response to GL 2008-01 detailing the results of our actions will be provided within six months following the completion of Refueling Outage (RO)-25, scheduled to end on November 2, 2008.

Basis for Alternative Schedule

PEC expects to complete the GL 2008-01 requested actions to a significant extent by October 11, 2008. However, the GL requested evaluations also necessitate detailed physical walkdowns of the subject piping systems to confirm pertinent design details (e.g., locations of high point vents), confirm as-built configurations (e.g., pipe elevations and slope), and examinations at locations potentially susceptible to gas accumulation. Portions of the subject piping systems are considered inaccessible during power operation due to one or more of the following reasons:

- The piping is in an area where dose rates are substantially higher during normal operation as compared to during plant shutdown conditions.
- Insulation removal may be necessary to fully characterize relevant geometry.
- Scaffolding may be needed to access the piping to fully characterize relevant geometry, and installation of scaffolding could jeopardize operability of adjacent equipment.

The next planned refueling outage (RO-25) is scheduled for September 27, 2008 through November 2, 2008. The time between the beginning of RO-25 and the due date of the nine month response for GL 2008-01 is judged to be insufficient to complete the necessary actions (i.e., conduct the walkdowns of inaccessible piping to the extent needed to fully characterize relevant design details and as-built configurations, and to perform any necessary examinations). Therefore, the results of these actions will be described in a response six months following the completion of RO-25, which is currently scheduled to end on November 2, 2008.

In the interim, it is expected that the HBRSEP, Unit No.2, ECCS, Decay Heat Removal, and Containment Spray Systems will continue to fulfill the applicable operability requirements and design functions. PEC expects to complete the GL 2008-01 actions to a significant extent by October 11, 2008. The validation walkdowns of the pipe segments requiring a refueling outage for access are planned to be completed during RO-25. It is also expected that the preliminary evaluations completed prior to RO-25 will provide results that show the systems within the scope of GL 2008-01 remain capable of performing the applicable design functions.

Performance of Technical Specifications surveillances, including pump testing, will continue to provide verification of system operability.

Based upon the preceding information, it is concluded that completion of detailed walkdowns, examinations, and completion of the required evaluations not later than six months following the next refueling outage, is an acceptable alternative course of action.