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 DIETZ, .C.R.      Carolina Power & Light Co.  
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SUBJECT: Concurs in findings & conclusions of WOG Rept WCAP 13587, Rev 1, transmitted by NUMARC on 930930, w/regard to reactor vessel core region mats in fulfillment of commitment to NRC in 921208 telcon re upper shelf energy of core region plates.

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Carolina Power & Light Company  
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October 27, 1993

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United States Nuclear Regulatory Commission  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
UPPER SHELF ENERGY OF REACTOR VESSEL CORE REGION MATERIALS

Gentlemen:

The purpose of this letter is to fulfill the commitment to the NRC by Carolina Power & Light Company (CP&L) in a conference call on December 8, 1992, regarding the subject of the upper shelf energy of core region plates.

CP&L has reviewed and concurs in the findings and conclusions of Westinghouse Owners' Group Report WCAP 13587, Revision 1, which was transmitted to the NRC by NUMARC on September 30, 1993, as they apply to all H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) reactor vessel core region materials. HBR2 is identifiable as Plant 7.

In performing the study, unduly large conservatisms were used which CP&L expects to reduce in the future. One of the conservatisms occurs because of the application of Regulatory Guide 1.99, Revision 2, in a way which is incompatible with the rate of reduction of the upper shelf energy of A302B steel with irradiation. CP&L anticipates that this behavioral difference of the plate alloys will be addressed in a future revision of the Regulatory Guide.

Questions regarding this matter may be referred to Mr. Jan S. Kozyra at (803) 383-1872.

Very truly yours,

Charles R. Dietz  
Vice President

JSK:lst

c: Mr. S. D. Ebnetter  
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