

February 10, 1994

Docket No. 50-261
License No. DPR-23

Carolina Power and Light Company
ATTN: Mr. C. R. Dietz
Vice President
H. B. Robinson Steam Electric Plant
Unit 2
P. O. Box 790
Hartsville, SC 29550-0790

Gentlemen:

SUBJECT: ENVIRONMENTAL QUALIFICATION OF SUBMERGED CABLES
(H. B. ROBINSON)

This refers to the conversation between Mr. A. F. Gibson, NRC, and Mr. C. R. Dietz, Carolina Power and Light Company on February 9, 1994, concerning the results of our safety evaluation on the Environmental Qualification (EQ) of certain cables installed in safety related systems at your H. B. Robinson plant. The issue was first identified during an NRC Inspection (50-261/89-26) conducted by this office on October 23 -27, 1989. During that inspection an unresolved item was identified regarding the adequacy of your EQ files in demonstrating qualification for certain safety-related EQ cables which may become submerged during or after a loss-of-cooling accident (LOCA). The issue was left unresolved pending further review by the NRC staff.

The NRC, with the assistance of Sandia National Laboratory, has completed the review of your EQ files, and your letter dated March 3, 1992, in which you documented your position on the qualification of specific cables that may become submerged. The staff has determined that post LOCA submergence qualification for the cables in question has not been established by your files. The basis for our conclusions are discussed in the enclosed Safety Evaluation (SE).

Your technical arguments that water immersion tests performed by the vendors on unaged and un-irradiated specimens were sufficient to demonstrate qualification for post LOCA submergence was not acceptable. Additionally, the Sandia test data published in NUREG/CR-5655 dated May 1991 on post LOCA submergence testing of Boston Insulated Wire (BIW) and Samuel Moore cable cannot be used as a basis for qualification of your cable, due to the reason indicated in the SE.

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We refer you to the guidance of NRC Generic Letter 88-07 in handling NRC identified safety issues involving unqualified equipment. Should you have any questions concerning this letter, please contact us.

Sincerely,

(ORIGINAL SIGNED BY A. F. GIBSON)

Albert F. Gibson, Director
Division of Reactor Safety

Enclosure:
Safety Evaluation

cc w/encl:
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cc w/encl - (cont'd see page 2)

Carolina Power and Light
Company

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