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SUBJECT: Forwards request for exemption from requirements of 10CFR50, App R, Section III.J in accordance w/10CFR50.12(a)(ii) re emergency lighting in outdoor areas.

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Carolina Power & Light Company
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 13510
Serial: RNP/94-1493

FEB 02 1995

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR EXEMPTION FROM 10 CFR 50, APPENDIX R, SECTION III.J
REGARDING EMERGENCY LIGHTING IN OUTDOOR AREAS

Gentlemen:

This letter transmits a request for exemption from the requirements of 10 CFR 50, Appendix R, Section III.J in accordance with 10 CFR 50.12 (a)(ii). The exemption will allow the use of dedicated portable emergency lighting for the operation of safe shutdown equipment, and access and egress thereto. This exemption request applies to equipment in outdoor areas within the protected area that are not presently provided with eight hour emergency lighting. The use of portable emergency lighting is an effective alternative to providing eight hour emergency lighting; therefore, the exemption from 10 CFR 50, Appendix R, Section III.J is appropriate in that "application of the regulation in the particular circumstance... is not necessary to achieve the underlying purpose of the rule."

The Enclosure to this letter provides the technical justification for the exemption request.

Questions regarding this matter may be referred to Mr. K. R. Jury at (803) 857-1363.

Very truly yours,

R. M. Krich
Manager - Regulatory Affairs

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RNP/94-1493
Page 2 of 2

Enclosure

c: Mr. S. D. Ebner, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

ENCLOSURE 1
REQUEST FOR EXEMPTION FROM 10 CFR 50, APPENDIX R, SECTION III.J
REGARDING EMERGENCY LIGHTING IN OUTDOOR AREAS

Recent analysis of Dedicated Shutdown Procedures and Operating Procedures has identified two (2) valves outside the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Turbine Building that require operation for certain safe shutdown conditions. These valves, Auxiliary Feedwater (AFW)-1 and AFW-104, are located at the bottom of the Condensate Storage Tank in an area that presently does not have emergency lighting as required by 10 CFR 50, Appendix R, Section III.J.

Carolina Power & Light (CP&L) Company proposes to use dedicated portable emergency lighting for operation of any safe shutdown equipment in outdoor areas within the protected area not presently covered by 8-hour emergency lighting. There presently exists 8-hour emergency lighting for some outdoor areas, i.e., the Refueling Water Storage Tank and the Dedicated Diesel Generator Building. This exemption request will not affect existing emergency lighting at HBRSEP.

Dedicated portable emergency lighting for this outdoor area is technically equivalent to the requirements of Section III.J. for the following reasons:

- (1) The portable lighting would provide adequate lighting for entering and exiting all outdoor areas and for reading equipment tag numbers.
- (2) There is other lighting available from Security lights and from existing 8-hour emergency lighting in the Turbine Building and outdoor areas. The portable lighting would be necessary to identify the equipment, and the existing nearby light sources would provide sufficient illumination for equipment operation.

Based on the above, the dedicated portable lighting would be as effective as verbatim compliance with the requirements of 10 CFR 50, Appendix R, Section III.J to provide permanent emergency lighting in outdoor areas of HBRSEP.