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KRICH,R.M. Carolina Power & Light Co.  
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SUBJECT: Documents info re request for TS change concerning refueling  
filter sys fans at plant.

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**Carolina Power & Light Company**

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Robinson File No: 13510H

Serial: RNP-RA/96-0121

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United States Nuclear Regulatory Commission

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

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ADDITIONAL INFORMATION REGARDING A REQUEST  
FOR A TECHNICAL SPECIFICATIONS CHANGE

Gentlemen:

This letter is being submitted to document information discussed during a conference call between representatives of Carolina Power & Light (CP&L) Company and the NRC on June 21, 1996. This information is related to our request for a Technical Specifications change submitted on July 17, 1995, concerning the refueling filter system fans at the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

During the conference call we informed the NRC representatives that we have concluded that the analyses documented in Updated Final Safety Analysis Report (UFSAR) Section 15.7.4, "Design Basis Fuel Handling Accidents," were performed using the assumptions delineated in NRC Safety Guide 25, "Assumptions Used For Evaluating The Potential Radiological Consequences Of A Fuel Handling Accident In The Fuel Handling And Storage Facility For Boiling And Pressurized Water Reactors," dated March 1972. Furthermore, the analyses for the fuel handling accident in containment and in the Spent Fuel Pool Building did not include credit for atmospheric mixing in the calculation of the off-site dose. This conclusion was substantiated by several documents, including Supplement 2 to the NRC Safety Evaluation dated May 20, 1974, supporting approval of a power upgrade that was transmitted by NRC letter dated March 30, 1979. We also informed the NRC that Spent Fuel Building Heating and Ventilation Exhaust (HVE) fan -15, the fan used during normal operation is not safety related; however, fan HVE - 15A, used for refueling operations, is safety related. The containment purge fans, HVE - 1A, and HVE - 1B, are not safety related; however, the two containment purge isolation valves are safety related, therefore, the ability to isolate the containment during a fuel handling accident is ensured.

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Questions regarding this matter may be referred to me at (803) 857-1802.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'R. M. Krich', written in a cursive style.

R. M. Krich  
Manager - Regulatory Affairs

JSK/klb

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