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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 AUTH. NAME: AUTHOR AFFILIATION  
 FORR, B.J. Carolina Power & Light Co.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Provides updated status on four App R exemption requests denied in draft SER & transmits clarifying info per NRC request. W/two aperture cards. Aperture cards are available in PDR.

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SERIAL: LAP-83-38

Carolina Power & Light Company

February 23, 1983

Director of Nuclear Reactor Regulation  
Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
REQUESTED INFORMATION TO SUPPORT EXEMPTION  
FROM THE REQUIREMENTS OF 10CFR50, APPENDIX R  
SECTION III

Dear Mr. Varga:

Carolina Power & Light Company (CP&L) filed a request for exemption from the requirements of Section III of Appendix R by letter dated March 11, 1981 and subsequent letters containing additional information. The Draft Appendix R Safety Evaluation Report (SER) for H. B. Robinson was received by CP&L on December 20, 1982. This letter provides an updated status on the four exemption requests denied in the Draft SER and transmits clarifying information requested by your staff.

1. Lube Oil Collection System - By letter dated January 7, 1983, CP&L submitted the clarifying information requested in the Draft SER to justify the existing Section III exemption request.
2. Pipe Alley - The attached drawing (E032-01 Rev. 1) provides the clarifying information requested in the Draft SER to justify the existing Section III exemption request.
3. Component Cooling Pump Room - The attached drawing (E032-02 Rev. 1) provides clarifying information to justify the existing Section III exemption request.
4. Cold shutdown within 72 hours - The Draft SER states that CP&L has not established a need for this exemption request and requires CP&L "to furnish a plan for achieving and maintaining cold shutdown within 72 hours." The safe shutdown capability being developed by CP&L utilizing natural circulation cooldown is expected to take longer than 72 hours. The NSSS vendor, Westinghouse, is performing a detailed analysis using this scenario to determine the exact number of hours required to achieve and maintain cold shutdown. The results of this analysis are expected by mid March. Carolina Power & Light Company will provide the results of this analysis to NRC as soon as they are available.

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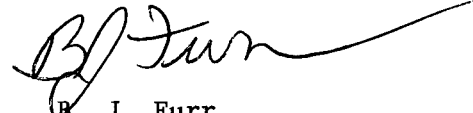
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F. PDR

February 23, 1983

Based upon information provided previously and that contained in this submittal, CP&L believes that an exemption from the requirements of 10CFR Appendix R Section III should be granted for H. B. Robinson Unit 2 for the first three exemption requests delineated above. Carolina Power & Light Company understands that this information, which clarifies the existing exemption requests, will be considered by the Staff under the exemption provisions of 10CFR50.48 and will be factored into the Staff's evaluation of the exemption requests and the final SER.

Further clarifying information concerning the 72 hour Cold Shutdown exemption request will be submitted to NRC in approximately one month. If you have any further questions regarding these exemption requests, please do not hesitate to contact us.

Yours very truly,



B. J. Furr  
Vice President  
Nuclear Operations

ONH/kjr (62150NH)  
Attachments

cc: Mr. J. P. O'Reilly (NRC-RII)  
Mr. G. Requa (NRC)  
Mr. Steve Weise (NRC-HBR)