



Carolina Power & Light Company  
MAR 05 1984

SERIAL: NLS-84-085

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  
SUPPLEMENT TO REQUEST FOR EXEMPTION FROM THE  
REQUIREMENTS OF 10 CFR 73.55

Dear Mr. Varga:

Summary

In Carolina Power & Light Company's (CP&L) previous letter to you, dated October 25, 1983, CP&L requested an exemption from the requirements of 10 CFR 73.55 for a portion of the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) steam generator repair program (SGRP). This previous correspondence was discussed with Mr. Charles E. Gaskin of the Office of Nuclear Material Safety and Safeguards in a meeting at HBR2 on December 15, 1983. As a result of this meeting and succeeding events, CP&L is supplementing this previous information and providing additional information regarding the schedule for this outage now in progress.

Discussion

Carolina Power & Light Company's previous correspondence, as noted above, discussed the purpose of the exemption request, briefly described the outage for which the exemption was requested, described the security measures or compensatory measures to be taken to protect the spent fuel, and referred to the schedule for the outage at that time. On January 26, 1984, HBR2 was forced to shutdown due to steam generator tube leaks. Subsequent inspections indicated that the steam generators had deteriorated to the point that continued operation prior to repair (the SGRP) was impractical. In view of the preceding, the decision was made to go forward with the SGRP at this time. Present projections are that this outage will require approximately 47 weeks. Based on comments provided by Mr. Gaskin at the aforementioned meeting we have modified the details of our previous request. These modifications revolve around the details of the compensatory security measures to be taken while the requested exemption is in effect. The primary change involves the time at which the exemption takes effect and the time at which the normal security program is reinstated. The attached appendix outlines these details and supersedes in its entirety the appendix of our previous submittal.

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As the specifics of the exemption being sought involve Safeguards Information, the information in the attached appendix should be protected in accordance with the provisions of 10 CFR 73.21.

As stated previously, CP&L recognizes its responsibility for maintaining an adequate level of security and is fully prepared to implement the measures necessary to protect HBR2 against radiological sabotage or theft of special nuclear material. Carolina Power & Light Company appreciates your cooperation in the consideration of this exemption request and stands ready to meet with you at any time to discuss the details of this matter. As noted earlier the SGRP has already begun. Due to the benefits expected from an early implementation of this exemption, CP&L requests that you expedite the NRC review and approval of this matter. If there is anything which CP&L can do to assist in expediting your review of this matter, please contact David C. Stadler, Project Engineer - Nuclear Licensing (919-836-6739) or John B. Walker, Jr., Project Specialist - Industrial Security (919-836-7316).

Yours very truly,



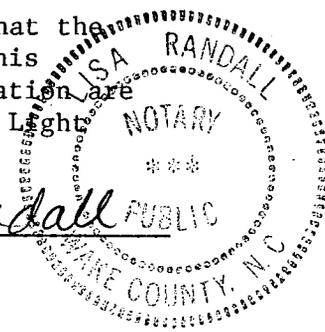
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

DCS/ccc (9552DCS)  
Attachment: Appendix

cc: Mr. J. P. O'Reilly (NRC-RII) W/A\*  
Mr. G. Requa (NRC)  
Mr. Steve Weise (NRC-HBR)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

  
Notary (Seal)



My commission expires: 5/18/88

\* Only those individuals with W/A (with appendix) following their names are to receive copies of the letter and Appendix. All other individuals and files receive the letter only.