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Mr. James P. O'Reilly
Director of Regulatory Operations
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 3100
Atlanta, GA 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
IE BULLETIN 80-05 - VACUUM CONDITION RESULTING IN DAMAGE TO
CHEMICAL VOLUME CONTROL SYSTEM (CVCS) HOLDUP TANKS

Dear Mr. O'Reilly:

In response to the subject bulletin, the following is a list of low-pressure or holdup tanks at H. B. Robinson Unit No. 2 that could contain primary system water:

1. Refueling Water Storage Tank
2. Waste Holdup Tank
3. Chemical and Volume Control System (CVCS) Holdup Tanks
4. Auxiliary Building Sump Tank "A" (equipment drains)
5. Chemical Drain Tank (radioactive lab drains)

The Auxiliary Building Sump, Chemical Drain, and Waste Holdup Tanks are each vented to atmosphere via a two-inch diameter unvalved vent line to the building exhaust. The Refueling Water Storage Tank is vented to atmosphere via a six-inch diameter unvalved vent line. Due to their vented condition, none of these tanks could be exposed to a negative pressure.

The CVCS Holdup Tanks (3) are interconnected to each other via a two-inch diameter vent header which is pressurized with cover gas by a one-inch diameter supply line from the Waste Gas Decay Tanks. The Waste Gas Decay Tanks are normally pressurized at 80 PSIG to 110 PSIG. This pressure is reduced by a two-inch control valve and maintained in the vent header at 1.0 PSIG to 1.3 PSIG.

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The maximum water withdrawal rate from the CVCS Holdup Tanks would be caused by the 12.5 gallon per minute gas stripper feed pumps. This withdrawal rate results in less than two cubic feet per minute volume reduction which would easily be compensated by the incoming cover gas from the vent header.

The cover gas can be removed from the CVCS Holdup Tanks via the waste gas compressors. Recirculating valves (discharge to suction) are installed on the compressors' discharge lines. These valves are set to open when the suction pressure falls to 1.5 PSIG, thus preventing the compressors from evacuating the tanks if the vent header inadvertently should become isolated.

Therefore, a negative pressure could not exist in the CVCS Holdup Tanks unless the vent header is inadvertently isolated or the control valves on the vent header and those on the waste gas compressor fail. The unlikelihood of such occurrences in addition to the very low volume reduction capacity of the pumps taking suction on the CVCS Holdup Tanks clearly justifies the continued operation of the unit.

However, in an effort to further decrease the probability of exposing the CVCS Holdup Tanks to a negative pressure, a vent header low-pressure alarm is to be installed. This alarm will notify the operators of any abnormal situation which could lead to failure of the tanks due to a vacuum condition. This alarm should be in service by the end of 1980, thus allowing sufficient time for procurement of material and modification development and implementation.

Carolina Power & Light Company believes the above review and actions adequately addresses and satisfies the concerns of the Bulletin. Therefore, no further action in addition to that discussed above is believed necessary regarding the matter.

If you have any questions, please contact my staff.

Very truly yours,



B. J. Furr
Vice President

Nuclear Operations Department

RAD/CSB/tma*

cc: Mr. V. Stello