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Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

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SERIAL: NO-80-1193

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE BULLETIN 80-15

Dear Mr. O'Reilly:

In response to IE Bulletin 80-15, the following information is provided relative to H. B. Robinson Unit No. 2. The following responses are numbered corresponding to the action paragraphs of the Bulletin.

1. Within 10 days of the date of this Bulletin, verify by direct inspection, in conjuction with the appropriate telephone company representative, that the ENS at your facility is powered in the manner described in the two enclosures.

Response:

The direct inspection was completed and the ENS at Robinson Plant is powered from on-site power. This was reported on June 26, 1980, to the Nuclear Operations Center by the ENS, to Mr. Herb Whitner, who was the on-site inspector, and to Mr. Austin Hardin at Region II office.

2. Those facilities which have station packages requiring on-site power but which are not connected to a safeguards instrumentation bus which is backed up by batteries and an inverter or equally reliable power supply, shall make necessary modifications and provide such a connection.

Response:

The power source to the ENS has been reviewed. The ENS at HBR is supplied by the Unit No. 1 Vital A/C power. It is automatically backed up with a propane engine driven emergency generator which is test operated weekly. The unique circumstances at the

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Robinson Plant (Unit No. 1-Fossil, Unit No. 2-Nuclear) result in this power supply configuration being highly desirable and sufficiently reliable to satisfy the intent of the Bulletin requirements. Specifically, the Unit 1 vital A/C is designed to be highly reliable since it is a system with automatic backup which is depended upon for turbine protection upon loss of normal A/C power. Additionally, because of the electrical isolation between the Unit No. 1 and Unit No. 2 electrical systems, with the exception of a total grid blackout (which has never occurred during the life of Unit 2), the Unit No. 1 electrical system would not be susceptible to an abnormal condition affecting Unit No. 2 requiring use of the ENS. In addition, if the ENS were connected to a safeguards instrument bus, the vital power would effectively be extended beyond the normal control of the operations personnel (i.e., to telephone company equipment). This would create the potential for needless challenges to the Reactor Protection System and the plant as a result of uncontrolled access to instrument bus circuits. Based on these reasons, no modifications to the existing configuration are considered necessary. Additionally, the existing configuration of powering the ENS is considered highly desirable and sufficiently reliable to satisfy the intent of the Bulletin requirements.

3. All facilities are to develop and conduct a test, within 60 days of the issuance of this Bulletin, to verify that all extensions of the ENS located at your facility(ies) would remain fully operable from the facility(ies) to the NRC Operations Center in the event of a loss of offsite power to your facility(ies). This is not intended to mean that an actual loss of offsite power be executed.

Response:

A test to verify that all extensions of the ENS will remain operable in the event of a loss of offsite power has been developed. However, this test cannot be conducted until the next scheduled outage of Unit No. 1. Such a test could cause the boiler combustion controls to be unstable during the transfer sequence and may cause unit trip. The next outage is currently scheduled for November, 1980, and a delay for implementing this item is requested until that outage. However, if an earlier outage of sufficient duration is experienced, we will perform the test at that time.

4. If it is determined that a station package requiring on-site power is not connected to a safeguards instrumentation bus backed up by automatic transfer to batteries and an inverter or an equally reliable power supply, notify the NRC Operations Center via the ENS within 24 hours after such determination.

Response:

It has been determined that the existing on-site power supply is adequate (see Item 2 response).

5. Prepare and issue an administrative procedure or directive which requires notification to the NRC Operations Center by commercial telephone or relayed message within one hour of the time that one or more extensions of the ENS located at your facility(ies) is subsequently found to be inoperable for any reason.

Response:

Revision No. 68 to the Robinson Plant Administration Instructions was implemented to satisfy this item.

The actions as indicated above are adequate to respond to the concerns of the Bulletin. If testing of the ENS during the Unit No. 1 outage identifies any problems, the Nuclear Operations Center will be notified within the time requirements of this Bulletin and amended response will be submitted. The results of all testing will be available at the plant for review by members of your staff.

Very truly yours,

for B J Furr

B. J. Furr
Vice President
Nuclear Operations Department

RSM/CSB/imj*

cc: Mr. V. Stello

Sworn to and subscribed before me this the 14 day of August, 1980

Beverly K. Morgan
Notary Public

My Commission Expires November 17, 1982