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SUBJECT: Forwards response to NRC Bulletin 89-003, "Potential Loss of Required Shutdown Margin During Refueling Operations."

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A. B CUTTER
Vice President
Nuclear Services Department

SERIAL: NLS-90-024
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
RESPONSE TO NRC BULLETIN 89-03

Gentlemen:

Carolina Power & Light Company (CP&L) hereby responds to NRC Bulletin 89-03, "Potential Loss of Required Shutdown Margin During Refueling Operations," for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). The Bulletin requested that licensees take specific actions to prevent potential violations of required shutdown margin and inadvertent criticality during refueling caused by improper movement and placement of highly reactive fuel during refueling operations. The HBR2 response to the specific actions requested by this Bulletin is attached.

Please refer any questions regarding this submittal to Mr. John Eads at (919) 546-4165.

Yours very truly,

A. B. Cutter

JHE/jhe
Attachment

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.

Lewis S. Rowell
Notary (Seal)

My commission expires: 7/12/94

LEWIS S. ROWELL NOTARY PUBLIC WAKE COUNTY, N.C.

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cc: Mr. S. D. Ebneter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo

RESPONSE TO SPECIFIC ACTIONS OF NRC BULLETIN 89-03
"POTENTIAL LOSS OF REQUIRED SHUTDOWN
MARGIN DURING REFUELING OPERATIONS"

Action No. 1 - Assure that any intermediate fuel assembly configuration (including control rods) intended to be used during refueling is identified and evaluated to maintain sufficient refueling boron concentration to result in a minimum shutdown margin of approximately 5%.

HBR2 Response -Procedures to ensure that any intermediate fuel assembly configuration (including control rods) intended to be used during refueling is identified and evaluated to maintain a boron concentration that results in a minimum shutdown margin of 5 percent will be in place prior to fuel handling activities in the next refueling outage, currently scheduled for September, 1990.

Action No. 2 - Assure that fuel loading procedures only allow those intermediate fuel assembly configurations that do not violate the allowable shutdown margin and that these procedures are strictly adhered to.

HBR2 Response - Fuel handling procedures will be revised to reflect Westinghouse guidelines to assure adequate shutdown margin is maintained during refueling operations. Procedure revisions will be in place prior to fuel handling activities in the next refueling outage.

Action No. 3 - Assure that the staff responsible for refueling operations is trained in the procedures recommended in Item 2 above and understand the potential consequences of violating these procedures. This training should include the fundamental aspects of criticality control with higher enriched fuel assemblies.

HBR2 Response - Personnel involved in refueling operations will have received the required training prior to performing fuel handling activities commencing with the next refueling outage.