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SUBJECT: Provides supplemental response to IE Bulletin 80-11 re un-
 reinforced masonry block walls,per Insp Rept 50-261/90-14.

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Robinson File No: 13510A

Serial: RNP/90-2791

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H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO: 50-261
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SUPPLEMENTAL RESPONSE TO I.E. BULLETIN 80-11

Gentlemen:

As committed to in NRC Inspection Report 90-14, CP&L hereby provides as a supplemental response to I.E. Bulletin 80-11, the plan and schedule for resolving current issues regarding un-reinforced Masonry Block Walls.

Due to the identification of penetrations containing blockouts in addition to those previously reported in our response to I.E. Bulletin 80-11, a project has been initiated to inspect, evaluate, repair, and document un-reinforced masonry wall blockouts. In resolving the issues relating to NRC Bulletin 80-11, this project will also identify issues related to 10CFR50, Appendix R. During the inspection and repair process, if any blockout which constitutes an Appendix R Fire Barrier Penetration is found with an unacceptable fire seal, it will be placed under a 7 day Limiting Condition for Operation as required by Plant Technical Specifications, and will be repaired with an approved Fire Barrier Seal or otherwise evaluated.

The plan for resolving IEB 80-11 issues contains the following elements:

A Special Procedure will provide for 100% inspection of blockouts per IEB-80-11. This procedure will provide specific guidance for inspection and evaluation, and will include a sampling program to establish a data base of materials and workmanship used in blockouts. This procedure will result in a generic design basis document for blockouts.

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A generic Justification for Continued Operation (JCO) will provide evaluation and document determination of the adequacy of existing fire barrier penetrations where a fire rating has not been established. Final resolution of the JCO will require review of the total program result to determine whether long term resolution will be generic evaluation, case-by-case evaluation, or repair.

The result of the above program will include, where needed, a blackout-by-blackout analysis package, modification packages as required, and an assessment of the long term resolution of individual blackouts covered by the generic JCO. This resolution will consider for each blackout the most prudent repair or evaluation method.

The schedule for this project, which will be worked during the upcoming planned refueling outage, contains the following milestones:

10-15-90: Complete Inspection per Special Procedure
12-01-90: Complete Plan for JCO Closeout (Appendix R Issues)
01-07-91: Complete Project Documentation for IEB 80-11

If you have any questions regarding this submittal, please contact Mr. J.D. Kloosterman, telephone (803)-383-1491.

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson S. E. Plant

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BCC
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