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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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SUBJECT: Corrects inaccuracies in NRC 800418 evaluation of Category A, TMI-2 Lessons Learned Task Force items implementation. No equipment is required to implement interim emergency sampling procedures.

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Carolina Power & Light Company

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Mr. D. G. Eisenhut, Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON, UNIT NO. 2
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IMPLEMENTATION OF CATEGORY A TMI LESSONS LEARNED ITEMS

Dear Mr. Eisenhut:

On April 18, 1980, the NRC transmitted a letter to Carolina Power & Light Company (CP&L) containing the staff's evaluation of the implementation of Category A TMI Lessons Learned Items at H. B. Robinson. After careful review, CP&L has determined that there are certain inaccuracies in the staff evaluation that need to be corrected. These are detailed below:

1) Item 2.1.4 Containment Isolation - page 4 of Enclosure 1 implies that CP&L has committed to impose administrative procedures which ensure that the isolation valves in three systems which will be modified during the 1980 refueling outage are closed prior to resetting containment isolation. In addition it is implied that CP&L has implemented administrative procedures which require manual isolation valves in nonessential systems to be locked closed.

This is not correct. CP&L committed in our March 31, 1980 letter to assign a dedicated person to shut normally shut manual isolation valves in case of an emergency any time they are open during plant operation. CP&L did not commit to nor does it believe that it is necessary to employ the other measures mentioned above.

2) Item 2.1.8a Improved Post-Accident Sampling Capability - page 6 of Enclosure 1 asks OIE to verify that equipment has been installed to implement the interim emergency sampling procedures committed to by CP&L.

This is not correct. No equipment is required to implement the interim emergency sampling procedures at H. B. Robinson. Any equipment installed will be in connection with meeting Category B items.

3) Item 2.1.8b Increased Range of Radiation Monitors - page 7 of Enclosure 1 states that steam line radiation monitors will be monitored in the Technical Support Center (TSC).

*Asst
S/P*

This is not correct. CP&L's December 31, 1979 letter stated that readouts will be available in the Control Room and near the vicinity of the detector. Transmission of these readings to the TSC will be evaluated along with other effluent measurements, which may or may not be required.

Additionally, it should be clarified what the term "steam dump" means. H. B. Robinson does not have atmospheric steam dumps. It does have, however, Steam Generator PORVs and safeties. It is these valves, the PORVs and safeties, which will have steam line monitors. The only steam dump at H. B. Robinson goes to the main condenser and will not be monitored. CP&L's letter of December 31, 1979 explains how vent paths from the main condenser will be monitored.

Carolina Power & Light Company believes that the above items in the Staff's evaluation should be corrected. CP&L also believes that the clarification of the above items should not change the basic conclusion of the evaluation, which is that H. B. Robinson has satisfied all Category A Items.

If you have any questions on this subject, please contact our staff.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

JJS/SDF/dk

cc: J. D. Neighbors (NRC)