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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Forwards documentation & commitments for completion of NUREG-0737 items applicable to facility.

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 TITLE: Response to NUREG-0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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Carolina Power & Light Company

December 29, 1981



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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NUREG-0737, JANUARY 1, 1982 ITEMS

Dear Mr. Eisenhut:

Carolina Power & Light Company (CP&L) hereby forwards the required documentation and commitments for completion of NUREG-0737, "Clarification of TMI Action Plan Requirements" items which are applicable to the Robinson Steam Electric Plant (HBR) Unit No. 2, and required to be complete by January 1, 1982. Enclosure 1 contains a listing of these January 1, 1982 items, along with CP&L's commitment. The attachments to this enclosure clarify CP&L's position on these items.

If you have any questions concerning these items, please contact our staff.

Yours very truly,

L. W. Eury
Senior Vice President
Power Supply

JHE/lr (4316)

Enclosure

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. W. J. Ross (NRC)

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H. B. ROBINSON
 NUREG-0737
JANUARY 1982 ITEMS

Item	Title	Description	CP&L Position	Reference
II.B.2	Plant shielding	2. Plant modifications	Complete	CP&L Letter 12-31-80
II.B.3	Postaccident sampling	2. Plant modifications	Will complete during NEXT REFUELING	CP&L Letter 9-15-81
II.E.1.1	Auxiliary feed- water system evaluation	2. Long term	Complete	CP&L Letter 6-8-81
II.F.1	Accident- monitoring	1. Noble gas monitor	Will complete during NEXT REFUELING	CP&L Letter 9-15-81
		2. Iodine/particulate sampling	Will complete during NEXT REFUELING	CP&L Letter 9-15-81
		3. Containment high- range monitor	Will complete during NEXT REFUELING	CP&L Letter 9-15-81
		4. Containment pressure	Complete	Attachment 1
		5. Containment water	Complete	Attachment 2
		6. Containment hydrogen	Complete	Attachment 3

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Item	Title	Description	CP&L Position	Reference
II.F.2	Instrumentation for detection of inadequate core cooling	3. Install Level instruments	To be determined	Attachment 7
II.K.2	Orders on B&W plants	13. Thermal-mechanical report	Complete	Attachment 4
		17. Voiding in RCS	Complete	Attachment 5
II.K.3	Final recommendations B&O task force	25. Power on pump seals a. Propose mods	Complete	Attachment 6
		30. SB LOCA methods b. Model	Complete	CP&L Letter 6-11-80

ATTACHMENT 1

Item II.F.1.4, "Accident Monitoring, Containment Pressure Monitor"

NUREG-0737 requires that all modifications necessary to provide a continuous indication of containment pressure in the control room be completed by January 1, 1982. All necessary modifications at the Robinson Plant have been completed. CP&L considers this item as complete.

ATTACHMENT 2

Item II.F.1.5, "Accident Monitoring, Containment Water Level"

NUREG-0737 requires that all modifications necessary to provide a continuous indication of containment water level in the control room be completed by January 1, 1982. All necessary modifications at the Robinson plant have been completed. CP&L considers this item as complete.

ATTACHMENT 3

Item II.F.1.6, "Accident Monitoring, Containment Hydrogen Monitor"

NUREG-0737 requires that all modifications necessary to provide a continuous indication of hydrogen concentration in the containment atmosphere in the control room be completed by January 1, 1982. All necessary modifications at the Robinson Plant have been completed. CP&L considers this item as complete.

ATTACHMENT 4

Item II.K.2.13, "Thermal-Mechanical Report"

NUREG-0737 requires that CP&L complete a detailed analysis of the thermal-mechanical conditions in the reactor vessel during recovery from small breaks with an extended loss of all feedwater by January 1, 1982. Westinghouse (in support of the Westinghouse Owners' Group of which CP&L is a participant) is performing an analysis for generic Westinghouse plant groupings to address this issue which will be submitted to the NRC by January 1, 1982. This generic study will be applicable to the H. B. Robinson Steam Electric Plant and can be referenced if additional efforts are necessary to completely address NRC concerns.

ATTACHMENT 5

Item II.K.2.17, "Voiding in RCS"

Westinghouse (in support of the Westinghouse Owners' Group) has performed a study which addresses the potential for void formation in Westinghouse designed nuclear steam supply systems during natural circulation cooldown/depressurization transients. This study has been submitted to the NRC by Westinghouse Owners' Group letter OG-57, dated April 20, 1981, and is applicable to the Robinson Plant.

In addition, the Westinghouse Owners' Group has developed a natural circulation cooldown guideline that takes the results of the study into account so as to preclude void formation in the upper head region during natural circulation cooldown/depressurization transients and specifies those conditions under which upper head voiding may occur. These Westinghouse Owners' Group generic guidelines have been submitted to the NRC by letter OG-64, dated November 30, 1981. The generic guidance developed by the Westinghouse Owners' Group (augmented as appropriate with plant specific consideration) will be utilized in the implementation of Robinson Plant specific operating procedures.

ATTACHMENT 6

Item II.K.3.25, "Power on Pump Seals"

NUREG-0737 requires that CP&L determine the consequences of a loss of RCP Seal cooling due to a loss of AC power (defined as loss of offsite power) for at least two hours. CP&L has completed a review, including Westinghouse Owners' Group information and availability of emergency power, and has determined that no modifications are necessary. This conclusion is based on the fact that during a loss of offsite AC power, the component cooling water system is still operable off the emergency busses and provides flow to the thermal barrier heat exchanger. In addition, one charging pump, also powered off the emergency busses, remains operable and can provide seal injection flow to the pump seals. CP&L considers this item as complete.

ATTACHMENT 7

Item II.F.2, "Instrumentation for Detection of Inadequate Core Cooling"

NUREG-0737 requires that CP&L install additional instrumentation to provide an unambiguous, easy-to-interpret indication of inadequate core cooling by January 1, 1982. By letter dated September 15, 1981, CP&L committed to complete installation of the level instrument during the next refueling outage. CP&L is presently re-evaluating that commitment. CP&L will provide additional clarification of its position on this item before January 29, 1982.