January 30, 1981

FILE: NG-3513 (R)

SERIAL: NO-81-121

Mr. James P. O'Reilly, Director United States Nuclear Regulatory Commission Region II 101 Marietta Street, Suite 3100 Atlanta, GA 30303

> H. P. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 DOCKET NO. 50-261 LICENSE NO. DPR-23 REVISION 3 TO IE BULLETIN 79-01B NINETY-DAY REPORT

Dear Mr. O'Reilly:

Attached you will find our response to the additional data requests of Supplement 3 to the subject IE Bulletin. Qualification data is provided for installed equipment resulting from TMI Action Plan requirements and a listing of equipment used to achieve a cold shutdown condition is also supplied. Cold shutdown equipment which is safety related and therefore has already been reported upon in previous submittals is indicated in the attached list.

We were pleased to note the additional guidance provided by Mr. Eisenhut's letter of January 19, 1981, "Information Regarding the Program for Environmental Qualification of Safety-Related Electrical Equipment (Generic Letter 51-05)".

In accordance with the guidance provided in that letter, CP&L has supplied that qualification data for non-safety grade cold shutdowr equipment which is readily available. Since this equipment is non-safety grade and has no qualification requirements, CP&L has no plans at this time to test or replace any of the non-safety grade equipment.

Mr. James P. O'Reilly

If you have any questions, please do not hesitate to contact my staff.



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Yours very truly,

B. J. Furr

Vice President Nuclear Operations

Sworn to and subscribed before me this 30th day of January, 1980. Jailin Y Pearl

My commission expires 10/19/85

cc: Mr. Don Neighbors (ONRR) Mr. Zoltan Rosztoczy (ONRR)

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PLANT IDENTIFICATION NUMBER	GENERIC NAME	PRIMA CONTA JUCAT INSIDE	RY INMENT ION DUTSIDE
B21-FT-4157	Sensor	X	
B21-FT-4158	Sensor	X	
B21-FT-4159	Seasor	X	
B21-F-4160	Sensor	X	
B21-FT-4161	Sensor	X	
B21-FT-4162	Sensor	X	
B21-FT-4163	Sensor	X	
B21-FT-4164	Sensor	X	
B21-FT-4'.65	Sensor	X	
B21-FT-4166	Sensor	x	
B21-FT-4167	Sensor	x	
B21-FAT-4157	Preamplifier		X
B21-FAT-4158	Preamplifier		X
B21-FAT-4159	Preamplifier		X
B21-FAT-4160	Preamplifier		X
B21-FAT-4161	Preamplifier		x
B21-FAT-4162	Preamplifier		x
B21-FAT-4163	Preamplifier		x
821-FAT-4164	Preamplifier		X
B21-FAT-4165	Preamplifier		X
321-FAT-4166	Preamplifier		X
B21-FAT-4157	Preamplifier		X
Amphenol	Coaxial Connector	X	

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	GOIL OPENIO					
PLANT IDENTIFICATION NUMBER	GENERIC NAME	PRIMARY CONTAIN LOCATIO	PRIMARY CONTAINMENT LOCATION INSIDE DUTSIN			
X-100E	Electrical Penetration	X	X			
х-100н	Electrical Penetration	x	X			
YL20	Instrument Cable		X			
		-				

	ENV	IRONMENT		DOCUMEN REFER	NTATION RENCE	QUALIFI- CATION METHOD	OUT- STANDING ITEMS
LOUTENT DESCRIPTION	PARAMETER	SPECIFI- CATION	QUALIFI- CATION	SPECIFI- CATION	QUALIFI- CATION		
SYSTEM: Automatic Depressurization PLANT ID. NO. B21-FT-4157, 4158, 4159, 4160, 4161, 4162, 4163,	OPERATING TIME	Short					*
4164, 4165, 4107 COMPONENT: Sensor	TEMPERA- TURE (°F)	Profile A (Attach.1)		FSAR			*
MANUFACTURE: NDT International MODEL NO. ries 700	PRESSURE (PSIA)	Profile (Attach.1)		FSAR			*
FUNCTION: Flow Detection	RELATIVE HUMIDITY (%)	100		FSAR			*
ACCURACY: N/A SPEC: DEMON:	CHEMICAL SPRAY	No	-	-		-	*
SERVICE: Automatic Depressurization Valve	RADIATIO (RADS)	(See Attach.1 1.1 ± 10 ⁸	>	FSAR			*
LOCATION: Inside Containment	AGING						*
FLOOD LEVEL ELEV.: N/A ABOVE FLOOD LEVEL: YES NO	SUBMERG.	N/A		N/A			None

SAFETY CATEGORY: Essential Active

* See Equipment Status Sheet Attached

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E.C. 1 PST NT DESCRIPTION	PARAMETER	SPECIFI- CATION	QUALIFI- CATION	SPECIFI- CATION	QUALIFI- CATION	METHOD	ITEMS
SYSTEM: Automatic Depressurization PLANE ID SO B21-FAT-4157, 4158, 4159, 4160, 4161, 4162, 4163,	OPERATING TIME	Short					*
COMPONENT: Preamplifier	TEMPERA- TURE	Profile E					*
MANUFACTURE: NDT International, Inc.	PRESSURE	14.9					*
MODEL NO. 400A FUNCTION: Signal Amplification	RELATIVE HUMIDITY (%)	100					*
ACCURACY: N/A SPEC: DEMON:	CHEMICAL SPRAY	No	-	-	-	-	*
SERVICE: Safety Helief Valve Monitoring System	RADIATIC (RADS)	(See NAttach. 1.1 x 10 ⁸	10				*
LOCATION: Outside Containment RX 20 SCEN	AGING						
FLOOD LEVEL ELEV.: N/A ABOVE FLOOD LEVEL: YES NO	SUBMERO). N/A		N/A			None

SAFETY CATEGORY: Essential Active

* See Equipment Status Sheet Attached

	ENV	IRONMENT		DOCUME REFEI	NTATION RENCE	QUALIFI- CATION METHOD	OUT- STANDING ITEMS
EQUIPMENT DESCRIPTION	PARAMETER	SFECIFI- CATION	QUALIFI- CATION	SPECIFI- CATION	QUALIFI- CATION		
SYSTEM: Common Component PLANT ID. NO. X-100E	OPERATING TIME	Short	30 Days		6 54,13	Analysis Simul. Test	None
COMPONENT: Electrical Penetration Assembly	TEMPERA- TURE (°F)	A Attach.1	A WW	FSAR	▲ 13	Simul. Test	None
MANUFACTURE: Westinghouse MODEL NO. Class E Penetration	PRESSURE (PSIA)	B Attach.1	A XX	FSAR	13	Simul. Test	None
FUNCTION: Containment Building	RELATIVE HUMIDITY (%)	100	100	FSAR	▲ 13	Simul. Test	None
ACCURACY: N/A SPEC: DEMON:	CHEMICAL SPRAY						None
SERVICE: SRV Monitoring	RADIATIO (RADS)	^N 1.1 x 10 ⁸	1.256x10	8 FSAR	▲. 2		None
LOCATION: Inside/Outside Containment	AGING						
FLOOD LEVEL ELEV.: N/A ABOVE FLOOD LEVEL: YES NO	SUBMERG	. N/A		N/A			None

SALETY CATEGORY: Essential Passive

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A Submitted with 90-Day Report, Rev. 1, dated 10/31/80

	ENV	DOCUMEN REFER	TATION	QUALIFI-	OUT- STANDING		
EQUIPMENT DESCRIPTION	PARAMETER	SPECIFI- CATION	QUALIFI- CATION	SPECIFI- CATION	QUALIFI- CATION	METHOD	ITEMS
SYSTEM: Common Components PLANT ID. NO. General	OPERATING	Short					*
COMPONENT: Connector	TEMPERA- TURE (°F)	A Attach.1		FSAR			*
MANUFACTURE: Amphenol MODEL NO. 36500 (Jack)	PRESSURE (PSIA)	B Attach.1		FSAR			*
34500 (Plug)FUNCTION:Catle Connection	RELATIVE HUMIDITY (%)	100		FSAR			*
ACCURACY: N/A SPEC: DEMON:	CHEMICAL SPRAY						*
SERVICE: SRV Monitoring	RADIATIC (RADS)	N1.1×10 ⁸		FSAR			*
LOCATION: Outside	AGING						None
FLOOD LEVEL ELEV.: N/A ABOVE FLOOD LEVEL: YES NO	ISUBMERG	. N/A		N/A			None

SAFETY CATEGORY: Essential Passive

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* See Equipment Status Sheet Attached

	ENVIROWMENT				DOCUMENTATION SEFERENCE		OUT- STANDING
EQUIPMENT DESCRIPTION	PARAMETUS	SPECIFI- CATION	QUALIFI- CATION	SPECIFI- CATION	QUALIFI- CATION	METHOD	ITEMS
SYSTEM: Common Components PLANT ID. NO. YL 20	OPERATING TIME	Long	30 DAYS		6 51	AGAL?S15	NONE
COMPONENT: 12 Pair #20	TEMPERA- TURE (°F)	Profile E (Attach.1	A Y	▲ 41	* 22	SIMUL. TEST	NONE
MANUFACTURE: Boston Insulated Wire & Cable Cc	PRESSURE (PSIA)	14,9	æ Z	▲ 41	22	SIMUL. TEST	NONE
MODEL NO. FUNCTION: Instrument Cable	RELATIVE HUMIDITY (%)	100	100	▲ 41	22	SIMUL. TEST	NONE
ACCURACY: N/A SPEC: DEMON:	CHEMICAL SPRAY	NO	BORIC ACID	-	22	SIMUL. TEST	NONE
SERVICE: Instrumentation	RADIATIO (RADS)	1×107	1×10	▲ 40	22	SEQUEN TEST	NONE
LOCATION: Outside Containment	AGING						VII-A
FLOOD LEVEL ELEN : N/A ABOVE FLOOD LEVEL: YES	SUBMERG	N/A		N/A			NONE

Safety Category: Essential Pussive

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EQUIPMENT STATUS

The components of the Safety Relief Valve (SRV) Monitoring System as installed per NUREG 0578 is currently undergoing an environmental qualification test (per IEEE 323-1974 standards). The test is being performed at Wyle Laboratories, Huntsville, Alabama (Wyle's Job No. 54098) and is expected to be completed by August 1901. If any components are found not to be qualified, the NRC will be informed by the appropriate reporting mechanism.

We have not been able to find qualification data for the Amphenol connector. They will be replaced by connectors manufactured by Gulion Industries which are included in the ongoing test at Wyle Laboratories.

ATTACHMENT 1

DETERMINATION OF ENVIRONMENTAL SERVICE ()NDITIONS

1. GENERAL

Chemical sprays are not part of the BSEP design basis. Demineralized water sprays are used inside Containment and have been considered.

In the design of the BSEP pressure suppression containment (i.e. drywelltorus) flooding is not considered to be a credible accident environment, due to the high volume, low hydraulic resistance flow paths from the drywell to the torus which immediately direct LOCA blowdown flow away from the drywell.

2. INSIDE PRIMARY CONTAINMENT

HELB does not affect environmental conditions inside the Containment and therefore is not considered for in-containment primary components.

The drywell and torus environmental conditions following a postulated LOCA are discussed in FSAR Section M7.9 and Design Report 12. Temperature and pressure response curves are labeled Profiles A and B respectively and are attached.

FSAR Figure M7.9 also provides values for post accident integrated radiation dose to equipment in the Primary Containment and these have been used in our evaluation.

3. INSIDE SECONDARY CONTAINMENT

a. Radiation

Post-LOCA radiation levels in various regions of the Reactor Building are due to leakages from the drywell and due to fluids which are recirculated from inside the Primary Containment to accomplish longterm cooling following a LOCA. The LOCA-induced radiation invironment, and the subsequent transport process, is evaluated in accordance with the guidelines in NUREG-0588 as follows:

- 100-percent of the noble gases, 25-percent of the halogens and 1-percent of the solid fission products are assumed to be airborne in the drywell.
- 50-percent of the halogens and 1-percent of the solid fission products are assumed to be in the suppression pool water.
- Drywell leakage is assumed to be 0.635-percent per day for the duration of the accident.
- 4) For conservatism, all leakages from drywell are assumed to be leaking into any one compartment adjacent to drywell. The leakage outflow from that compartment is then assumed to be uniformly mixed in the remainder of the Reactor Building. The conservatism of this method lies in the conservatively high computed values for the concentrations of fission products in each of the ESF compartments.

The resultant peak activities in various regions of the Reactor Building are presented in Table IV-1; the time-integrated doses for the ESF components in Reactor Building are presented in Table IV-2, and as referenced in BSEP Design Report No. 12 of March 1972.

b. Temperature

Our continuing evaluation of the Reactor Building post-LOCA environment disclosed that for elevations 20-feet and above the curve used in the 45-Day Report did not consider all heat sources.

The temperature profiles for the Reactor Building post-LOCA and post-HELB are attached for El. 20' to 117' as Profile E.

Detailed qualification data has not been established as yet for the SRV position indicating equipment, however we expect type testing now underway will provide this data.

c. Pressure

Reactor Building peak pressure data is included as an Accident Pressure Peak of 14.9 PSIA for El. 20' and above. This peak is applicable only during the HELB and is of such short duration that the effect upon essential equipment is considered to be negligible, and does not affect its operability. For post-LOCA conditions there is no significant pressure increase in the Reactor Building.

d. Humidity

The bounding post-accident humidity in the Reactor Building is considered to be 100% (HELB).

Significant flooding does not occur outside the drywell as a result of the postulated HELBS.







TABLE IV-1

LOCATION OF SUBSTANTIAL FISSION PRODUCT INVENTORY

SOURCE LOCATION	INVENTORY, Ci			
Reactor Building (Uniform Dispersal)	Total: N.G.: Iodine:	8.1 x 10 ⁶ 5.6 x 10 ⁶ 2.5 x 10 ⁶		
SGTS Filters in Reactor Building	Iodine:	4.2 x 10 ⁵		
Drywell	Total: N.G.: Iodine:	5.5×10^8 4.0 x 10 ⁸ 1.5 x 10 ⁸		
Pressure Suppression Chamber	Iodine:	3.0 x 10 ⁸		
Typical Small Compartment (Adjacent to drywell in Reactor Building)	Total:	10 ⁵		
Typical Large Compartment (Adjacent to drywell in Reactor Building)	Total:	10 ⁶		

TABLE IV-2

EXPECTED DOSES FOR RADIATION SENSITIVE ESF COMPONENTS

Component	Location	Threshold (Rads)	Normal Operating Dose (Rads) 40 Years	<u>Maximum Accid</u> (Rads) <u>First Hour</u>	ent Dose 30 Days	Comments
Limitorque Valve Operators	Inside Drywell	5 x 10 ⁷	6 x 10 ⁷ (Maximum)		4 x 10 ⁷	Threshold dose applies to lubri- cation seals, made of Viton. These seals can be periodically replaced to keep the normal oper- ating dose substantially below the threshold. The listed normal operating dose is the maximum dry- well dose, i.e., at the outside surface of the sacrificial shield at core mid-plane. Leakage from the seals does not imply failure of the operators to function.
Solenoid Valves	Reactor Building Below 20' El	6 x 10 ⁷ .	2 x 10 ³	1 x 10 ⁵	9 x 10 ⁶	Accident dose based on conserva- tive assumption of non-uniform mixing of fission products in Reactor Building. Dose given is maximum for any compartment adja- cent to the drywell. Normal operating dose based on 5 mr/hr for 40-years.
Pressure Switches/ Transmitters	Reactor Building Below 20' El	2 x 10 ⁸	2×10^3	1×10^{5}	9 x 10 ⁶	Same comment as for solenoid valves.
Pump Motors: • Lube • Insulation • Seals	RHR Room CS Room	1×10^{8} 5 x 10 ⁷ 5 x 10 ⁶	2×10^{3} 2 x 10^{3} 2 x 10^{3}	1×10^{5} 1×10^{5} 1×10^{5}	9×10^{6} 9 x 10^{6} 9 x 10^{6}	Failure of seals leads to leakage, which does not render pump in-

operable.

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TABLE IV-2 (Cont'd.)

Component	Location	Threshold (Rads)	Operating Dose (Rads) 40 Years	<u>Maximum Accid</u> (Rads) <u>First Hour</u>	dent Dose) 30 Days	Comments
Electronics: • Semiconductors • Capacitors • Inductors • Insulators (Organic)	Reactor Building Below 20' El.	1×10^{8} 3×10^{8} 2×10^{9} 5×10^{7}	2×10^{3} 2×10^{3} 2×10^{3} 2×10^{3} 2×10^{3}	1×10^5 1×10^5 1×10^5 1×10^5 1×10^5	9 x 10^{6} 9 x 10^{6} 9 x 10^{6} 9 x 10^{6} 9 x 10^{6}	
Solenoid Valves	Reactor Bldg. Above 20' El.	6 x 10 ⁷	2×10^{3}	1×10^{3}	1 x 10 ⁵	
Pressure Switches/ Transmitters	Reactor Bldg. Above 20' E1.	2.1 x 10 ⁸	2 x 10 ³	1×10^{3}	1 × 10 ⁵	
Pump Motors: • Lube • Insulation • Seals	Reactor Bldg. Above 20' El.	1×10^{8} 5 x 10 ⁷ 5 x 10 ⁶	2×10^{3} 2×10^{3} 2×10^{3}	1×10^{3} 1×10^{3} 1×10^{3}	1×10^{5} 1×10^{5} 1×10^{5}	
Electronics: • Semiconductors • Capacitors • Inductors • Insulators (Organic)	Reactor Bldg. Above 20' El.	$ \begin{array}{r} 1 \times 10^8 \\ 3 \times 10^8 \\ 2 \times 10^9 \\ 5 \times 10^7 \end{array} $	2×10^{3} 2×10^{3} 2×10^{3} 2×10^{3}	$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	1×10^{5} 1×10^{5} 1×10^{5} 1×10^{5} 1×10^{5}	

REFERENCES:

 "The Effects of Nuclear Radiation on Electronic Components, Including Semiconductors," REIC Report No. 36. Battelle Memorial Institute, Columbus, Ohio, October 1, 1964.

(2) "Space Materials Handbook," Second Edition, Document No. ML-TDR-64-40, AF Materials Laboratory, Wright-Patterson Air Force Base, Ohio (Prepared by Lockheed Missiles and Space Company, Sunnyvale, Calif.), January 1965.

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