



Thomas D. Walt
Vice President
Robinson Nuclear Plant
Progress Energy Carolinas, Inc.

AUG 22 2007

10 CFR 50.48(c)

Serial: RNP-RA/07-0049

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

LETTER OF INTENT TO ADOPT NFPA 805,
"PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION
FOR LIGHT WATER REACTOR ELECTRIC GENERATING PLANTS, 2001 EDITION"

Ladies and Gentlemen:

The NRC was informed by letter dated June 10, 2005, that it is the intent of Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), and Florida Power Corporation, now doing business as Progress Energy Florida, Inc. (PEF), to adopt National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition," in accordance with 10 CFR 50.48(c) for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2, the Shearon Harris Nuclear Power Plant (SHNPP), Unit No. 1, the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, and the Crystal River Unit No. 3 Nuclear Generating Plant.

In that same letter, Progress Energy stated that PEC and PEF would submit an additional letter of intent for each plant after SHNPP to identify the beginning of each plant's enforcement discretion window.

This letter is provided to inform the NRC that PEC intends to adopt NFPA 805, in accordance with 10 CFR 50.48(c), for HBRSEP, Unit No. 2.

The NRC interim Enforcement Policy (69 Federal Register (FR) 33684, June 16, 2004; 70 FR 2662, January 14, 2005; and 71 FR 19905, April 18, 2006) provides guidelines on enforcement discretion for identified noncompliances. Noncompliances must be entered into the licensee's Corrective Action Program, must not be associated with findings that the Reactor Oversight Process Significance Determination Process would evaluate as Red, or would not be categorized as Severity Level I, and appropriate compensatory measures have been taken. As outlined in the Enforcement Policy, enforcement discretion begins upon receipt of the licensee's letter of intent.

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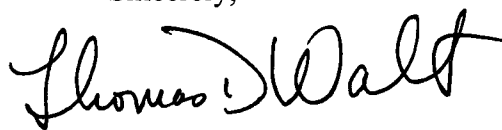
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PEC requests an enforcement discretion period of three years for HBRSEP, Unit No. 2, consistent with the NRC's Enforcement Policy (71 FR 19905, April 18, 2006) which extended the enforcement discretion period to three years for transition to NFPA 805. PEC understands this letter of intent initiates a period of enforcement discretion for HBRSEP, Unit No. 2, during which no enforcement actions will be taken for non-compliances discovered as a result of evaluations performed in support of this licensing basis transition.

The transition will be considered complete upon receipt of the approved license amendment authorizing the adoption of NFPA 805.

If you have any questions concerning this matter, please contact Mr. C. T. Baucom at (843) 857-1253.

Sincerely,

A handwritten signature in black ink that reads "Thomas Walt". The signature is written in a cursive style with a large, sweeping initial "T".

AHV/ahv

c: Dr. W. D. Travers, NRC, Region II
Ms. M. G. Vaaler, NRC, NRR
NRC Resident Inspector