



Serial: RNP-RA/01-0082

**APR 23 2001**

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

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

SUPPLEMENTAL INFORMATION PERTAINING TO  
REQUEST FOR RELIEF NO. 33 REGARDING EXAMINATION  
OF CONTROL ROD DRIVE MECHANISM HOUSING SEAL WELD

Ladies and Gentlemen:

By letter dated April 20, 2001, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, submitted Relief Request No. 33 requesting relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, regarding a weld overlay technique and visual examination in lieu of liquid penetrant examinations for a Control Rod Drive Mechanism (CRDM) canopy seal weld repair. This relief request was the subject of a teleconference with the NRC staff on April 20, 2001. As a result of this teleconference, Mr. Richard Emch, Jr., NRC, NRR, indicated verbal staff approval of the proposed alternative in lieu of the Code requirements. The following supplemental information is provided as requested by the NRC in the teleconference.

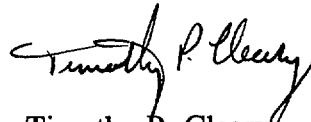
HBRSEP, Unit No. 2, requested relief from ASME B&PV Code, Section XI, 1986 Edition with no Addenda, Paragraph IWA-4120(a) which requires that repairs to pressure retaining components and their supports, including appurtenances and subassemblies or parts of a component be performed in accordance with the Owner's Design Specification and the original Construction Code of the component or system, or later editions and addenda of the construction code. The Owner's Design Specification calls for material in contact with the reactor coolant to be 300 series stainless steel, 400 series stainless steel, Inconel, Stellite or Haynes 25. The proposed alternative in the relief uses nickel-based Alloy 52 (i.e., Inconel Filler Metal 52, UNS N06052) as a weld repair material. Alloy 52 was designed for improved resistance to stress corrosion cracking in Pressurized Water Reactor environments, has mechanical properties exceeding the stainless base metals, and has excellent qualities for overlay on stainless steels. The composition of the metal is listed in Code Case 2142-1, "F-Number Grouping for Ni-Cr-Fe Classification UNS N06052 Filler Material," which accepts the material as an F-43 material in ASME B&PV Code, Section IX, "Qualification Standard for Welding and Brazing Procedures, Welders, Brazers, and Welding and Brazing Operators." Therefore, there is no need to amend the relief request to include relief from the Code requirement to meet the Owner's Design Specification.

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The proposed alternative to liquid penetrant examination is a visual (VT-1) examination using a camera to facilitate observation of weld flaws. The acceptance criterion for indications is 1/16 inch, which is the same as Code required acceptance criterion in ASME B&PV Code, Section III, 1986 Edition with no Addenda, Paragraph NB-5352, "Acceptance Standards." The visual acuity of the camera system was demonstrated to resolve to at least 0.001 inch, which is more restrictive than the 1/32 inch resolution as required by ASME B&PV Code, Section XI, 1986 Edition with no Addenda, Paragraph IWA-2211, "Visual Examination VT-1."

If you have any questions regarding this matter, please contact Mr. H. K. Chernoff.

Sincerely,

A handwritten signature in dark ink, appearing to read "Timothy P. Cleary". The signature is fluid and cursive, with the first name "Timothy" and last name "Cleary" clearly distinguishable.

Timothy P. Cleary  
Plant General Manager

ALG/alg

c: Mr. L. A. Reyes, NRC, Region II  
Mr. R. Subbaratnam, NRC, NRR  
Mr. Richard Emch, Jr., NRC, NRR  
NRC Resident Inspectors