

November 6, 2003

Mr. J. W. Moyer, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - H. B. ROBINSON STEAM
ELECTRIC PLANT, UNIT NO. 2 (TAC NO. MB7932)

Dear Mr. Moyer:

By letter dated February 11, 2003, Carolina Power & Light Company submitted Request for Relief No. 34 from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (the Code), Section XI, for H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP2). The request for relief is for the third 10-year inservice inspection interval, in which HBRSEP2 adopted the 1986 Edition of ASME Section XI as the Code of record, with the exception of Class 1, Examination Category B-J piping weld examinations, which are determined by the 1974 Edition through Summer 1975 Addenda of Section XI, as allowed by Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a.

Based on our review of the information provided by you, we have determined that additional information is required to complete our review. The details about the required information are provided in the enclosure. This information was discussed with your staff during a conference call on October 9, 2003. We request that you provide your response as soon as possible, but no later than December 30, 2003.

Sincerely,

/RA/

Chandu P. Patel, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure:
Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
ON THIRD 10-YEAR INSERVICE INSPECTION INTERVAL
REQUEST FOR RELIEF
FOR
CAROLINA POWER & LIGHT COMPANY
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NUMBER 50-261

1.0 SCOPE

By letter dated February 11, 2003, Carolina Power & Light Company (the licensee, CP&L) submitted Request for Relief No. 34 from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (the Code), Section XI, for H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP2). The request for relief is for the third 10-year inservice inspection (ISI) interval, in which HBRSEP2 adopted the 1986 Edition of ASME Section XI as the Code of record, with the exception of Class 1, Examination Category B-J piping weld examinations, which are determined by the 1974 Edition through Summer 1975 Addenda of Section XI, as allowed by Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a.

In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee has submitted Relief Request 34 to address many components for which 100-percent coverage could not be obtained. The Code requires that essentially 100 percent of the examination volumes in IWB-2500-1 be completed. "Essentially 100%," as clarified by ASME Code Case N-460, is greater than 90-percent coverage of the examination volume, or surface area, as applicable. Code Case N-460 has been adopted by the licensee. 10 CFR 50.55a(g)(5)(iii) states that when licensees determine that conformance with Code requirements is impractical at their facility, they shall submit information to support this determination. The NRC will evaluate such requests based on impracticality, and may impose alternatives, giving due consideration to public safety and the burden imposed on the licensee.

Based on our review of the information provided by CP&L, we have determined that additional information is required to complete our review.

2.0 REQUEST FOR ADDITIONAL INFORMATION

The licensee has requested relief in accordance with 10 CFR 50.55a(g)(5)(iii) based upon the argument that the Code examinations are impractical at their facility. However, the licensee must present adequate information to support a determination that the required examinations are impractical (not simply inconvenient) to perform to the extent required by the Code. This information should include drawings, or other physical descriptions, of the component examination areas, including examination coverage(s), weld cross-sections, etc., necessary to support the request. In addition, the licensee should submit argument(s) as to why the use of other methods would not reasonably increase the examination coverage(s).

In Attachment I for Relief Request 34 of the licensee's submittal (Table 1 on page 2 of 9), the limitation discussion for Reactor Vessel Upper Shell Welds states that the reduced volumetric coverage (90 percent) is due to "Proximity of the inlet nozzle inner radius section." This discussion does not provide an adequate description of the physical limitation or indicate

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whether other techniques such as different interrogation angles could have practically increased the coverage.

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Similar issues exist with the remainder of the components listed in Table 1. The drawings provided by the licensee are inadequate to determine the extent of actual scanning limitations. The licensee should address the following issues in the revised relief request:

- Provide a technical basis for each component listed in Table 1, describing in detail the examination limitation, and discuss whether other examinations may be used to increase or supplement the limited examinations. The technical basis should include a cross-sectional sketch of the weld, indicating ultrasonic coverage(s) and details of the weld and base metal materials. The technical basis should confirm, where applicable, that the examinations that were performed were also qualified under Appendix VIII of ASME Section XI.
- Indicate what degradation mechanism(s) is most likely to occur in this weld and a technical basis for whether the achieved examination coverage could reasonably be expected to detect this degradation.

Mr. J. W. Moyer
Carolina Power & Light Company

H. B. Robinson Steam Electric Plant,
Unit No. 2

cc:

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