

From: [Jones, Heather](#)
To: richard.hightower@pqnmail.com
Cc: [Billoch, Araceli](#); [Diaz-Sanabria, Yoira](#); [Wallace, Jay](#); [Lupold, Timothy](#)
Subject: Robinson - Request for Additional Information - License Renewal Commitment regarding the Nickel-Alloy Nozzles and Penetrations Program Inspection Plan
Date: Friday, January 27, 2012 12:58:00 PM

By letter dated March 29, 2009, (Agencywide Document Access and Management Systems (ADAMS) Accession No. ML092170065), as supplemented by letter dated April 13, 2010, (ADAMS Accession No. ML1010900153), Carolina Power and Light Company (the licensee) submitted the "Nickel-Alloy Nozzles and Penetrations Program Inspection Plan" to satisfy commitment item number 31 of the licensee's "Response to Open and Confirmatory Items," letter dated September 16, 2003 (ADAMS Accession No. ML032650884) for the H. B. Robinson Steam Electric Plant. To complete its review of the subject aging management Program Inspection Plan, the staff requests the additional information. If you have any questions or would like to arrange a teleconference to discuss the following information, please contact Heather Jones at (301)415-4054 or e-mail Heather.Jones@nrc.gov.

REQUEST FOR ADDITIONAL INFORMATION (RAI)

The subject commitment item states:

"The Nickel-Alloy Nozzles and Penetrations Program is a new program that will incorporate the following:

- (1) evaluations of indications will be performed under the American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel Code, Section XI program,
- (2) corrective actions for augmented inspections will be performed in accordance with repair and replacement procedures equivalent to those requirements in ASME Boiler & Pressure Vessel Code, Section XI,
- (3) RNP will maintain its involvement in Industry initiatives and will systematically assess for implementation applicable programmatic enhancements, that are agreed upon between the NRC and the nuclear power industry to monitor for, detect, evaluate, and correct cracking in the vessel head penetration (VHP) nozzles, specifically as the actions relate to ensuring the Integrity of VHP nozzles in the RNP upper reactor vessel head during the extended period of operation, and
- (4) RNP will submit, for review and approval, its Inspection plan for the Nickel-Alloy Nozzles and Penetrations Program, as it will be implemented from the applicant's participation in industry initiatives, prior to July 31, 2009."

The staff notes that revisions to guidance concerning augmented inspection of pressure retaining nickel alloy welds are now codified in Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(g)(6)(ii)(D) through (F). The staff additionally notes that the requirements in 10 CFR 50.55a(g)(6)(ii)(D) through (F) bound the recommendations contained in Rev 0 of the GALL Report and all subsequent revisions. Based on these changes, the staff finds that meeting the elements of the commitment, as stated, are not sufficient to provide reasonable assurance that the aging of the components under consideration will be

adequately managed.

Alternatively, the staff finds that compliance with 10 CFR 50.55a(g)(6)(ii)(D) through (F) is sufficient to provide such assurance. Finally, that staff notes that there is insufficient information contained in the submission to demonstrate compliance with all aspects of 10 CFR 50.55a(g)(6)(ii)(D) through (F).

To complete its review of the Inspection Plan, the staff requests the following additional information:

1. Please confirm compliance with the regulatory requirements found in 10 CFR 50.55a(g)(6)(ii)(D) through (F).
2. Please provide the rationale for the proposed Flux Thimble Tube inspection frequency, including any trending analysis of inspection results which would support this inspection frequency.
3. Discuss whether, on the basis of industry and regulatory relevant guidance, new components should be added to, or the inspection type or frequency changed in, the Nickel-Alloy Nozzles and Penetrations Program Inspection Plan.
4. Submit a revised Nickel-Alloy Nozzles and Penetrations Program Inspection Plan which reflects industry and regulatory guidance.

Heather Jones
Project Manager, Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation
301.415.4054