

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Submits proposed revised commitment to perform RPV weld insps at or near end of ISI interval w/o limiting period of time between individual RPV weld or component exams to ten years.

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Carolina Power & Light Company

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Robinson File No: 13510

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Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

**PROPOSED REVISION TO COMMITMENT REGARDING
REACTOR PRESSURE VESSEL INSPECTION RELIEF REQUEST**

Sir or Madam:

This letter proposes a revision to a Carolina Power & Light (CP&L) Company commitment that formed the basis for NRC conditions stated in a Safety Evaluation (SE). The CP&L commitment and NRC conditions are in regard to an alternative examination schedule for in-service inspection (ISI) of Reactor Pressure Vessel (RPV) items, Examination Categories B-A, B-D, B-F, and B-N-1 at the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. Specifically, in correspondence related to a relief request granted on March 1, 1995, CP&L committed that no more than ten (10) years would elapse between examinations of individual RPV welds or components. As a result of the CP&L commitment, the NRC imposed conditions on the granted relief for welds that limited the period of time between individual RPV Examinations in the third and fourth 10-year ISI interval to 10 years. Consequently, the third 10-year ISI interval examinations were being scheduled for completion during Refueling Outage (RO)-19, which is scheduled to begin on September 25, 1999.

CP&L proposes to revise its commitment to perform RPV weld inspections at or near the end of the ISI interval without limiting the period of time between individual RPV weld or component examinations to 10 years.

The proposed change to the CP&L commitment for code relief will ensure that these inspections are completed, in accordance with American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," before the end of the current (i.e., third) 10-year ISI interval. The third 10-year ISI interval for HBRSEP, Unit No. 2 began February 19, 1992, and concludes February 19, 2002. Upon NRC approval of the proposed change to the conditions of the relief,

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the RPV weld examinations will be scheduled for completion during Refueling Outage 20, which is currently scheduled to begin on April 7, 2001. As proposed, the change to the CP&L commitment will result in a small delay in the performance of the RPV examinations beyond the October 27, 2000, committed date.

HBRSEP, Unit No. 2, was granted relief from the ASME B&PV Code, Section XI, scheduling requirements for RPV Examination Categories B-A, B-D, B-F, and B-N-1 by NRC letter dated March 1, 1995. The authorized alternative examination schedule for the Category B-A, B-D, and B-F welds is to perform examinations in the last period of the third 10-year interval, provided that the period of time between individual RPV weld or component examinations does not exceed 10 years. The NRC stipulation that the period of time between individual RPV weld or component examinations not exceed 10 years reflected the CP&L commitment provided in its relief request dated July 29, 1994, which stated that the ten year exams "... will be accelerated forward so that all examinations will be performed on or before October 27, 2000." CP&L proposes to revise its commitment to perform RPV weld inspections at or near the end of the 10-year ISI interval without limiting the period of time between individual RPV weld or component examinations to 10 years.

In accordance with 10 CFR 50.55a(g)(1), the applicable edition of Section XI of the ASME B&PV Code for the HBRSEP, Unit No. 2, third 10-year ISI interval is the 1986 Edition. The 1986 Edition of the ASME B&PV Code does not allow certain RPV examinations to be deferred to the third period of the 10 year ISI interval. Hence, CP&L requested and received relief from the 1986 Edition schedule requirements for RPV inspections. ASME B&PV Code paragraph IWA-2430, "Inspection Intervals," allows any component inspection interval under Program B to be extended or decreased by as much as 1 year. Additionally, the ASME B&PV Code does not require that the maximum interval between individual RPV weld or component examinations be 10 years. Therefore, the proposed change to the CP&L commitment is allowed by the ASME B&PV Code. If the proposed commitment is acceptable to the NRC, the ASME B&PV Code, in conjunction with the NRC granted relief, will allow the scheduling of RPV Examinations as late as February 19, 2003, for the third 10-year ISI interval. Additionally, Code Case N-521, "Alternative Rules for Deferral of Inspections of Nozzle-to-Vessel Welds, Inside Radius Sections, and Nozzle-to-Safe End Welds of a Pressurized Water Reactor (PWR) Vessel," permits deferral of Examination Categories B-D and B-F to the end of the inspection interval without requiring a maximum of 10 years between examinations of any weld or component.

Inspection of RPV welds will involve removal of the RPV lower internals to examine the RPV interior welds and RPV components inaccessible when the lower internals are installed. RO-19 is planned to include refueling, maintenance on one Reactor Coolant Pump (RCP) seal assembly, and an examination of one Steam Generator (SG). RO-20 is planned to be considerably longer to accommodate scheduling of the 10 year inspection of the two Low Pressure Turbines, the containment Integrated Leak Rate Test, maintenance on two RCP seal assemblies and examinations of three SGs. RO-19 will be scheduled for 28 days in length if

- RPV weld examinations are not performed and 38 days if RPV examinations are required to be performed. RO-20 is scheduled to last approximately 45 days, and the schedule length is not significantly impacted by performance of the RPV examinations. Therefore, approximately 10 outage days are saved if the RPV examinations are performed in RO-20 instead of RO-19.

Therefore, the proposed change to the CP&L commitment to perform RPV Examination Categories B-A, B-D, B-F, and B-N-1 at or near the end of the 10-year ISI interval without limiting the time between examinations of any individual weld or component to 10 years will ensure that these inspections are completed in accordance with the ASME B&PV Code, Section XI and granted reliefs. The proposed change in commitment will result in an insignificant delay of approximately six months for performance of the required examinations beyond the previously committed date in accordance with the proposed schedule.

The NRC is requested to concur with the proposed change in commitment by February 29, 1999, in order to support orderly scheduling of RO-19 and RO-20 activities.

If you have any questions concerning this matter, please contact Mr. H. K. Chernoff of my staff.

Very truly yours,



T. M. Wilkerson
Manager, Regulatory Affairs

ALG/alg

c: Mr. L. A. Reyes, USNRC, Region II
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USNRC Resident Inspector, HBRSEP