

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co      05000261  
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 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Requests relief from ASME Code, Section XI, 1986 edition re  
 inservice insp & testing programs for third 10-yr interval.  
 Corrects misleading statement in response to Generic Ltr  
 89-04 re steam generator insps.

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# Carolina Power & Light Company

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AUG 01 1991

SERIAL: NLS-91-180

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
RELIEF REQUESTS - INSERVICE INSPECTION AND INSERVICE TESTING  
PROGRAMS FOR THIRD TEN-YEAR INTERVAL

Gentlemen:

In accordance with 10CFR50.55(g)(5)(iii), Carolina Power & Light Company (CP&L) requests specific reliefs from the requirements of the ASME Code, Section XI, 1986 Edition (the Code). These reliefs are required to support implementation of the Inservice Inspection (ISI) and Inservice Testing (IST) Programs for the third ten-year interval at the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). The third interval is scheduled to commence February 19, 1992 and is presently scheduled to end on February 21, 2002.

To assist you in your review of the reliefs requested, we have enclosed copies of both the ISI and IST Programs for interval three. The specific reliefs are addressed within their respective program documents under Tab A for the ISI Program and Attachments A for pumps and B for valves for the IST Program. It should be noted that the guidelines issued by the NRC in Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," were used to develop the IST Program. Additionally, steam generator inspections will continue to be performed as required by the plant's Technical Specification 4.2.

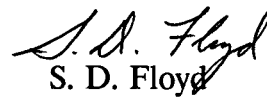
In addition, during development of the Third Ten-Year IST Program, while conducting a review of the requirements for our commitments to testing of high/low-pressure system interfaces with the Reactor Coolant System (RCS), a misleading notation was discovered in our response to Generic Letter 87-06, "Periodic Verification of Leak-Tight Integrity of Pressure Isolation Valves." This notation (Table 1) described the testing performed on HBR2's pressure isolation valves and incorrectly stated that leak testing was performed on valves SI-866A and B (hot leg injection isolation). This testing is not required by Technical Specifications; in fact, the 866 valves are closed and power removed when RCS pressure is greater than 1000 psig. This testing has never been individually performed on SI-866A and B. It should also be noted that due to the evolving nature of the IST Program, the Third Interval Program supersedes our prior response to Generic Letter 87-06.

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Your approval of the subject reliefs on a timely basis is requested to allow sufficient time to implement the associated procedures. Should you have any questions regarding this matter, please contact Mr. R. W. Prunty of the Nuclear Licensing Section at (919) 546-7318.

Yours very truly,



S. D. Floyd  
Manager  
Nuclear Licensing Section

JSK/jbw (1215RNP)

Enclosures

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