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 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
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SUBJECT: Requests NRC concurrence re postponement of implementation  
 schedule per NRC Bulletin 88-009.

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**Carolina Power & Light Company**

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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  
REQUEST FOR ALTERNATIVE SCHEDULE, REGARDING NRC BULLETIN 88-09  
IMPLEMENTATION SCHEDULE

Gentlemen:

Carolina Power & Light Company (CP&L) hereby requests NRC concurrence regarding a postponement of the implementation schedule identified in NRC Bulletin 88-09 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2).

The Bulletin requires establishment and implementation of a thimble tube inspection program prior to restart from the next refueling outage after receipt of the Bulletin.

The original thimble tube design at HBR2 was replaced with a new design during the 1987 refueling outage. The new thimble tube design consists of two tubes eccentrically positioned one internal to the other with thermocouple leads in the annulus between the two tubes. Due to the short operating history with this type thimble tube, little, if any, data exists on tube wall thinning for this configuration. Additionally, an in-situ inspection methodology that can produce accurate, quantifiable results regarding the state of wall thinning is not known to exist, and the establishment of such methodology is impracticable to complete and implement prior to restart from the next refueling outage currently scheduled for November 1988. However, CP&L has been working with Westinghouse and is in the process of developing an inspection methodology and acceptance criteria. This effort is anticipated to be completed during 1989 and would be implemented after program development during the 1990 refueling outage (Refueling 13) or during a cold shutdown of sufficient duration to allow thimble tube inspection.

In addition to the impracticability of development of an inspection methodology at this time, the following additional information is provided. In 17 years of operation HBR2 did not experience any thimble tube leakage due to wall thinning with the old style thimble tubes. The existing thimble tubes

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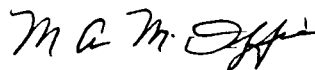
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have experienced only one cycle of operation. With the larger diameter of the new tubes and the double wall construction (which would require two-barriers to be breached), the tubes should be less susceptible to vibration thinning and leakage.

In summary, Carolina Power & Light believes that the good operating history of HBR2 with the original tubes, the impracticability of an inspection methodology at this time, and the reduced susceptibility of the new configuration to vibration and leakage fully justifies postponement of the inspection requirements until Refueling Outage 13.

Should you have any questions regarding this matter, please contact Mr. L. I. Loflin at (919) 836-6242.

Yours very truly,



M. A. McDuffie

DBB/lah (5462MDM)

cc: Dr. J. Nelson Grace  
Mr. R. Lo  
Mr. L. Garner (NRC - HBR)