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SUBJECT: Forwards Relief Requests 19 & 20 re exam requirements of ASME code,Section XI.

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Carolina Power & Light Company

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SERIAL: NLS-88-258
10CFR50.55a

R. B. RICHEY, Manager
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
IN-SERVICE INSPECTION - RELIEF REQUEST NO. 19 AND 20

Gentlemen:

Carolina Power & Light Company herein requests relief from certain examination requirements specified by Section XI of the ASME Boiler and Pressure Vessel Code.

The two enclosures to this submittal identify the specific reliefs requested, including the Code requirements, alternative examinations, and the bases for the requests. Relief Request No. 19 relates to the first ten-year interval. Relief Request No. 20 relates to the second ten-year interval.

Relief No. 19 is requested to resolve a documentation deficiency which was discovered during a Region II NRC inspection as discussed in Inspection Report No. 50-261/88-17, dated July 27, 1988. The relief request was not submitted to the Office of Nuclear Reactor Regulation (NRR) for approval, but was submitted as an enclosure to a required Ninety-Day Inservice Inspection Report to Region II on January 13, 1983, Serial: RSEP/83-52. This issue was discussed with Mr. R. Lo of NRR.

In accordance with 10CFR170.12, a check in the amount of \$150 in payment of an application fee is enclosed.

If you have any questions concerning this letter, please contact Mr. R. W. Prunty at (919) 836-7318.

Yours very truly,


R. B. Richey

DBB/crs (5480JSK)
Enclosure

cc: Mr. M. L. Ernst
Mr. R. Lo

Mr. L. Garner (NRC - HBR)
Mr. J. L. Coley (NRC - RII)

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Relief Request #19

Relief Request for Vessel Interior Clad Examinations

Code Requirement: (First 10-Year Inspection Interval) ASME Code Section XI, 1974 Summer 1975 Addenda

Table IWB-2600

<u>Item No.</u>	<u>Category</u>	<u>Component</u>	<u>Method</u>	<u>Extent</u>
<u>R. Vessel</u>				
B1.13	B-I-1	Closure Head Cladding	1) Visual & Surface, or 2) Volumetric	6 Patches
<u>R. Vessel</u>				
B1.14	B-I-1	Vessel Cladding	Visual	6 Patches
<u>Pressurizer</u>				
B2.9	B-I-2	Vessel Cladding	Visual	1 Patch
<u>Steam Generator A, B, and C</u>				
B3.8	B-I-2	Vessel Cladding	Visual	1 Patch each manway

Code Relief Request:

Eliminate visual, surface, and volumetric examination (as applicable).

Alternative Examinations:

None

Basis for Relief Request:

- 1) These examinations have been eliminated from later ASME Code Editions and Addendum.
- 2) These are high radiation areas (as high as 300 mr/min) and personnel exposure would be high (estimated 2100 mr).
- 3) Relief is requested based on previous examinations performed during the first 10-year interval and ALARA considerations.

Relief Request #20

Relief Request for Regenerative Heat Exchanger Examinations

Code Requirements:

ASME Code Section XI, 1977 Summer 1978 Addenda, Table IWB-2500-1, Item #B2.51, B2.60, and B3.150 require volumetric examination.

Table IWC-2500-1, Item C1.10 and C1.30 require volumetric examination.

Exam Category B-B, Pressure-Retaining Welds in Vessels other than Reactor Vessels, Item #B2.51 and B2.60

Exam Category B-D, Full Penetration Welds of Nozzles in Vessels, Item #B3.150

Exam Category C-A, Pressure-Retaining Welds in Pressure Vessel, Item #C1.10-C1.30

Code Relief Request:

Relief is requested from volumetric and surface examination requirements of the regenerative heat exchanger shell and nozzle welds.

Alternative Examination:

VT-2 during hydrostatic test at the end of the interval.

Licensee's Basis for Relief:

Based on radiation exposures in the area, i.e., general area of 3 to 4 R/hr and 9 to 10 R/hr on contact with hot spots of 12 to 15 R/hr, and in view that previous examination revealed no indications, relief is requested from volumetric and surface examinations of the regenerative heat exchanger shell and nozzles.