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 AUTH. NAME: AUTHOR AFFILIATION
 CUTTER, A. B. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 VRAGA, S. A. Operating Reactors Branch 1

SUBJECT: Forwards addl Relief Request 12 from 2nd 10-yr inservice
 insp re volumetric exam of circumferential shell welds in
 seal water HX & Request 13 re volumetric exam of all nozzle
 to vessel welds, per NRC 850111 SER, Item B.3.120.

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Carolina Power & Light Company

MAY 01 1985

SERIAL: NLS-85-136

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
SUPPLEMENTAL RELIEF REQUESTS
INSERVICE INSPECTION (ISI) PROGRAM

Dear Mr. Varga:

Our previous letters dated January 18, 1983 and April 30, 1984 provided an inservice inspection program, revisions and additional information related to requests for relief from certain code requirements determined impractical to perform at the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2).

Carolina Power & Light Company hereby requests additional relief from the second ten-year ISI requirements for HBR2. The details of the relief requests are attached. Relief Request #12 is an additional request. Relief Request #13 is a supplemental request being re-submitted for your review. Request #13 is based on Item B.3.120 on Table 1 of the NRC Safety Evaluation Report issued by letter dated January 11, 1985.

If you have any questions on the attached relief requests, please contact Mr. S. D. Floyd at (919) 836-6901.

Yours very truly,

A. B. Cutter - Vice President
Nuclear Engineering & Licensing

ONH/pgp (1399ONH)

Attachments

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

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Request for Relief - Circumferential Shell Welds in Seal Water Heat Exchanger Category C-A, Item C.1.10

Code Requirement

Volumetric examination of circumferential shell welds at gross structural discontinuities during each inspection interval on 100% of the length of each weld.

Code Relief Request

Relief is requested from volumetric examinations of the seal water heat exchanger head-to-shell and shell-to-flange welds.

Alternative Examination

Liquid penetrant examination will be performed on the welds and on one-half inch of base metal on each side of the welds for 100% of the weld lengths in lieu of the volumetric requirement.

Licensee's Basis for Requesting Relief

The thickness of the material utilized for the construction of this component (0.187 inch) is such that meaningful results could not be expected with ultrasonic examination as required by IWC-2500-1. The proposed alternative examination is as capable of detecting significant defects in 0.187 inch material as the Code-required volumetric examination.

Request for Relief-Full Penetration Welds of Nozzles in Vessels Category B-D,
Item B.3.120 Pressurizer Nozzle Inside Radius Section

Code Requirement

Volumetric examination of all nozzle to vessel welds and adjacent areas of nozzle and vessel.

Code Relief Request

Relief is requested from volumetric examinations of the Pressurizer Nozzle Inner Radius sections.

Alternative Examination

Visual examination of the nozzle inner radii will be performed to the extent practical once during the interval only if the pressurizer is opened for other types of examinations or for maintenance purposes.

Licensee's Basis for Requesting Relief

The nozzles are integrally cast with the heads of the Robinson Unit 2 pressurizer; thus, there are no welds and the configuration of the nozzle at the inner radius section prevents meaningful volumetric examination. Practical alternative techniques to volumetrically examining the inner radius section which would produce meaningful results are not currently available. The surge nozzle inner radius is not accessible due to the heaters connected inside the bottom head and the retaining basket as shown on the attached sketch.

