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 CUTTER, A. B. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Requests addl relief from second 10yr inservice insp requirements, consisting of encl Relief Request 14 re pressure retaining welds in reactor vessel exam Category B-A Item B.1.30, "Shell-to-Flange Weld."

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Carolina Power & Light Company

SERIAL: NLS-86-123

APR 22 1986

Director of Nuclear Reactor Regulation  
Attention: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing - A  
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. Rubenstein:

Our previous letters dated January 18, 1983, April 30, 1984, and May 1, 1985 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 #14 is an additional request.

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

ABC/MDM/ccc (3666MDM)

Attachment

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

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## RELIEF REQUEST #14

### REQUEST FOR RELIEF - PRESSURE RETAINING WELDS IN REACTOR VESSEL EXAMINATION CATEGORY B-A ITEM NO. B1.30 SHELL-TO-FLANGE WELD

#### Code Requirement

Volumetric examination of 100% of the weld length during the inspection interval.

#### Code Relief Request

Relief is requested for deferral of the second period volumetric examination of an additional 33 1/3% of the weld length from the flange face until at or near the end of the inspection interval.

#### Alternative Examination

Volumetric examination from the flange face will be expanded to include 100% of the weld length in conjunction with the examination required to be performed from the vessel wall. These examinations will be performed at or near the end of the inspection interval when the internals are removed.

#### Licensee's Basis for Requesting Relief

Table IWB-2500-1 Note: (6) in the 1983 edition of Section XI allows these examinations to be performed at the end of the third period of the interval provided that 50% of the shell-to-flange weld is examined by the end of the first period.

For the first ten-year interval, the flange to vessel weld was volumetrically examined 100% from the vessel wall in 1982. During the first period of the second ten-year interval (1984) 33 1/3% of the length of the weld was examined from the flange face.

The examination program plan for H. B. Robinson is based on the 1977 edition of Section XI ASME Boiler and Pressure Vessel Code with addendum through the 1978 Summer addenda. This requires examination of 100% of the weld length during the inspection interval. The 1978 Summer addenda allows partial deferral of examinations provided examinations are performed from the flange face during each period. On this basis, the flange-to-shell weld was divided into three equal sections to correspond with the three periods of the interval. Relief is requested only for the examination from the flange face for that one third section scheduled presently for the second period of the inspection interval. Relief thus granted would coincide with the 1983 edition of Section XI with the exception that 33 1/3% of the weld would be inspected during the first period instead of 50%. The examination of an additional 16 2/3% of the weld in order to provide full compliance with the 1983 edition is considered an unnecessary expense of resources and radiation exposure. The proposed alternative examination of 100% of the weld from both the flange face and the vessel wall at the end of the interval will provide better in-service monitoring of the area of interest since the 33 1/3% portion inspected during the first period will be re-examined at the end of the interval.