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FROM: Carolina Power & Light Co Raleigh, N.C. 27602 E.E. Utley		DATE OF DOC 10-10-75	DATE REC'D 10-14-75	LTR XX	TWX	RPT	OTHER
TO: Mr. B.C. Rusche		ORIG 3 signed	CC 37	OTHER	SENT NRC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 40	DOCKET NO: 50-261		

DESCRIPTION: Ltr notarized 10-10-75 request for a proposed revision to Tech Specs for H.B. Robinson Unit 2 to the in-service surveillance requirements to clarify the Tech Specs with attached proposed revision page 4.2-22....

ENCLOSURES:

PLANT NAME: H.B. Robinson Unit 2

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ACKNOWLEDGED

FOR ACTION/INFORMATION

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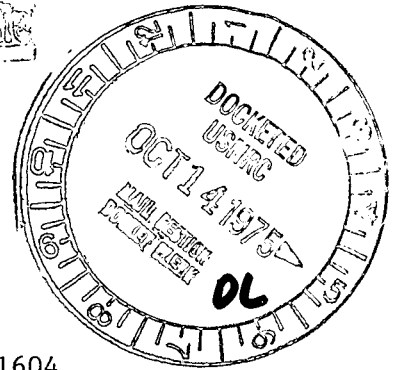
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Carolina Power & Light Company

October 10, 1975

Regulatory Docket



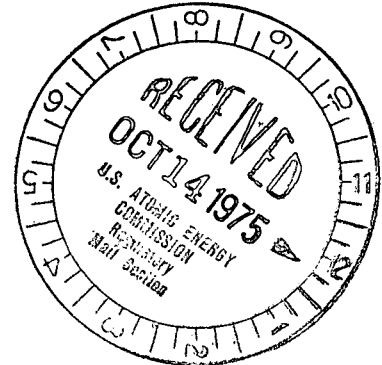
File: NG-3514 (R)

Serial: NG-75-1604

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Rusche:

H. B. ROBINSON UNIT NO. 2
LICENSE DPR-23
REQUEST FOR LICENSE AMENDMENT -
REVISION OF TECHNICAL SPECIFICATIONS



In accordance with the Code of Federal Regulations, Title 10, Part 50.59 and Part 2.101, Carolina Power & Light Company submits a proposed revision to the Technical Specifications for H. B. Robinson Unit No. 2. The revision, attached to this letter, proposes a change to the in-service surveillance requirements to clarify the Technical Specifications.

The in-service surveillance requirements for integrally welded supports, item 4-5 on page 4.2-22, require visual and volumetric examinations for accessible welds. However, a portion of the integrally welded supports in H. B. Robinson Unit No. 2 are fillet welded and the configuration of these welds is such that meaningful results cannot be obtained by a volumetric examination. Therefore, we propose to substitute surface examinations for volumetric examinations on those supports with fillet welds.

A volumetric examination is performed to indicate the presence of sub-surface discontinuities with a method or technique capable of examining the entire volume of metal contained beneath the surface to be examined. Due to the geometric configuration of metal parts welded together with a fillet weld, acceptance standards have not been developed from which meaningful results can be obtained. Fillet welds are used to weld two parts together at an inside corner, thus leaving a crevice between the parts. This crevice between the parts precludes obtaining meaningful results. In this case a surface examination is needed to assure that no cracks or discontinuities have propagated to the surface of the weld.

Mr. Benard C. Rusche

- 2 -

October 10, 1975

In order that we may have an unambiguous set of Technical Specifications on which to base our five year in-service inspection, we request that this proposed revision be acted upon before the start of our refueling outage on November 1, 1975. Your timely attention to this request will be greatly appreciated.

Yours very truly,




E. E. Utley
Vice-President
Bulk Power Supply

CSB:jwk

Attachment

Sworn to and subscribed before me this 10th day of October.

My commission expires July 4, 1980.



Notary Public

TABLE 4.2-1 (Cont'd)

Item No.	Examination Category	Components and Parts To Be Examined	Method	Extent of Examination (Percent in 10 Year Interval)	Extent of Examination (Percent in 5 Year Interval)	Remarks
4.1	F	<u>Piping Pressure Boundary</u> Vessel, pump and valve safe-ends to primary pipe welds and safe-ends in branch piping welds	Visual and Surface and Volumetric	100%	0%	This examination covers only the pressurizer safe-ends.
4.2	J	Circumferential and longitudinal pipe welds	Visual and Volumetric	25%	5%	1) Exception is taken to inaccessible welds. 2) Exception is taken for socket welds.
4.3	C-1	Pressure-retaining bolting		Not Applicable	Not Applicable	
4.4	C-2	Pressure-retaining bolting	Visual	100%	33%	
4.5	K-1	Integrally welded supports	Visual and Volumetric	100%	33%	Exception is taken for supports which are not accessible. Surface examinations will be performed in lieu of volumetric examinations on fillet welds.
4.6	K-2	Piping support and hanger	Visual	100%	33%	Exception is taken for those supports which are not accessible.
5.1	L-1	<u>Pump Pressure Boundary</u> Pump casing welds		0%	0%	No meaningful ultrasonic examinations can be performed on these welds.

10-10-75

Regulatory Document File