

From: [Jordan, Natreon](#)
To: [Zaremba, Arthur H.](#)
Cc: [Shoop, Undine](#); [Duc, Joshua Brian](#)
Subject: Acceptance Review for Proposed Alternative for RPV Cold Leg Dissimilar Metal Weld Inspections
Date: Tuesday, August 13, 2019 1:52:00 PM

Mr. Zaremba,

Pursuant to Title 10 of the *Code of Federal Regulations (10 CFR) 50.55a(z)(1)*, by letter dated July 23, 2019 (Agencywide Documents Access and Management System Accession No. ML19204A082), Duke Energy (the licensee) submitted a request, for the H.B. Robinson Steam Electric Plant, Unit 2 Facility (Robinson), to the U.S. Nuclear Regulatory Commission (NRC) to grant relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) specifically related to the frequency of inspection of the reactor pressure vessel (RPV) cold leg nozzle dissimilar metal (DM) butt welds and the augmented inspections of ASME Code Case N-770-2 as prescribed by 10 CFR 50.55a(g)(6)(ii)(F). Specifically, pursuant to 10 CFR 50.55a(z)(1), the licensee proposed an alternative frequency of volumetric examination for the RPV cold leg nozzle DM butt welds on the basis that the alternative provides an acceptable level of quality and safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an assessment regarding the acceptability of the proposed request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, you should be aware that there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that review of the proposed alternative will take approximately 160 hours to complete. The NRC staff expects to complete the review of the licensing action by July 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the request and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. If you have any questions, please contact me at (301) 415-7410.

Thanks,

Natreon (Nate) Jordan

Nuclear Engineer (Project Manager)

Plant Licensing Branch II-2

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