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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

May 9, 2018

Mr. Ernest J. Kapopoulos, Jr. Site Vice President H.B. Robinson Steam Electric Plant Duke Energy 3581 West Entrance Road, RNPA01 Hartsville, SC 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2– FLOOD HAZARD MITIGATION STRATEGIES ASSESSMENT (CAC NO. MF7969 AND EPID L-2016-JLD-0007)

Dear Mr. Kapopoulos:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, under Title 10 of the *Code of Federal Regulations*, Section 50.54(f), hereafter referred to as the "50.54(f) letter." The request was issued in connection with implementing lessons learned from the 2011 accident at the Fukushima Daiichi nuclear power plant, as documented in the NRC's Near-Term Task Force report (ADAMS Accession No. ML111861807).

Enclosure 2 to the 50.54(f) letter requested that licensees reevaluate flood hazards for their site(s) using present-day methods and regulatory guidance used by the NRC staff when reviewing applications for early site permits and combined licenses. Concurrent with the reevaluation of flood hazards, licensees were required to develop and implement mitigating strategies in accordance with NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A735). In order to proceed with implementation of Order EA-12-049, licensees used the current licensing basis flood hazard or the most recent flood hazard information, which may not have been based on present-day methodologies and guidance, in the development of their mitigating strategies.

By letter dated April 12, 2017 (ADAMS Accession No. ML17107A215), Duke Energy Progress, LLC (the licensee) submitted its flood hazard mitigation strategies assessment (MSA) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The MSAs are intended to confirm that licensees have adequately addressed the reevaluated flooding hazards within their mitigating strategies for beyond-design-basis external events. The purpose of this letter is to provide the NRC's assessment of the Robinson MSA.

The Enclosure transmitted herewith contains Security-Related Information. When separated from the Enclosure, this document is decontrolled.

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The NRC staff has concluded that the Robinson MSA was performed consistent with the guidance described in Appendix G of Nuclear Energy Institute (NEI) guidance document NEI 12-06, Revision 2, as endorsed by Japan Lessons-Learned Division (JLD) interim staff guidance (ISG) JLD-ISG-2012-01, Revision 1. In addition, the licensee has demonstrated that the alternate mitigation strategies, if appropriately implemented, are reasonably protected from reevaluated flood hazard conditions for beyond-design-basis external events. This closes out the NRC's efforts associated with CAC No. MF7969 and EPID L-2016-JLD-0007.

If you have any questions, please contact me at 301-415-2901 or via e-mail at John.Boska@nrc.gov.

Sincerely,

John Boska

Jøhn Boska, Senior Project Manager Beyond-Design-Basis Management Branch Division of Licensing Projects Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: Staff Assessment Related to the Mitigating Strategies Assessment for Robinson (non-public)

cc (cover letter only): Distribution via Listserv

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