

September 5, 2000

Mr. D. E. Young, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) - REQUEST FOR RELIEF FROM AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE, SECTION XI, REGARDING AUSTENITIC WELD EXAMINATION REQUIREMENTS - REQUEST NO. 29, H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2 (TAC NO. MA9733)

Dear Mr. Young:

By letter dated August 10, 2000, you submitted Relief Request No. 29, seeking relief from the requirements of the ASME Code, Section XI, regarding austenitic weld examination requirements for the H. B. Robinson Steam Electric Plant, Unit No. 2. The staff has reviewed the information provided by you in the subject request for relief. Based on the above review, the enclosed RAI is required to complete the evaluation of the subject request for relief. Please provide the requested information within 30 days from the date of this letter. You may refer to staff guidance on the requirements for granting of reliefs described in NRR Office Letter No. 808, "Relief Requests Reviews," July 31, 2000.

If you should have any questions regarding this RAI, please contact me at (301) 415-1478.

Sincerely,

/RA/

Ram Subbaratnam, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: RAI

cc w/encl: See next page

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Yes/No	Yes/No	Yes/No

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REQUEST FOR ADDITIONAL INFORMATION

1. The letter discusses piping welds adjacent to or attaching to the reactor pressure vessel (RPV). Provide a list of the welds involved (unique identity), and base materials (steel, stainless steel, or dissimilar material). Also, identify the inservice inspection requirement in Table 2500-1, Examination Category and Item, for these welds.
2. The letter states that Category B-J, Item B9.11 has received authorization to perform examinations from the inside surface in conjunction with the third 10-year interval. This statement has a Footnote 3 attached to it. In the letter, Footnote 3 is not a safety evaluation, and it does not address Category B-J welds. Provide the staff with the issue date, author of the authorizing letter, and specific weld identities. Footnote 1, Relief Request (RR)-08 was granted for selected B9.11 welds. If the correct reference is Footnote 1, discuss how successful the examinations were from the inside surface of these welds.
3. Identify the specific paragraph in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a that provides the basis for requesting relief [50.55a(a)(3)(i), 50.55a(a)(3)(ii), or 50.55a(g)(6)(i)]. Tailor the relief request to support the specific basis.
4. The letter touches on an alternative with its request to conduct the exams in conjunction with the RPV from inside surfaces of the welds.

For a 50.55a(g)(6)(i) request, the request should discuss the difficulties associated with an examination performed from the outside surfaces (the Performance Demonstration Initiative generic request provides some guidance). A case must be made that the ultrasonic testing (UT) technique that will be used is the same (similar) technique that was used for previous examinations or was shown to provide the same results. Identify when the previous examinations occurred (Refueling Outage (RO) #). Reference the paragraphs in the Code or state the differences from the Code in a discussion of the technique that was/will be used, i.e., scanning angles, scan directions, calibration, coverage, and demonstrations, if any.

For a 50.55a(a)(3)(i) or (ii) request, 10 CFR 50.55a(a)(3) has the phrase "the applicant shall demonstrate..." Describe the demonstration. Explain how you arrived at a determination of "an acceptable level of quality and safety" or "without a compensating increase in the level of quality and safety." Discuss the procedure in terms of prescriptive (Appendix III) or performance-based (Appendix VIII).

5. The relief is requested for RO-20, which starts April 2001. How long is RO-20 expected to last? Are any UT examinations of the subject welds expected to occur after November 22, 2002?

ENCLOSURE

Mr. D. E. Young
Carolina Power & Light Company

H. B. Robinson Steam Electric
Plant, Unit No. 2

cc:

Mr. William D. Johnson
Vice President and Corporate Secretary
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Mr. Mel Fry, Director
N.C. Department of Environment
and Natural Resources
Division of Radiation Protection
3825 Barrett Dr.
Raleigh, North Carolina 27609-7721

Ms. Karen E. Long
Assistant Attorney General
State of North Carolina
Post Office Box 629
Raleigh, North Carolina 27602

Mr. Robert P. Gruber
Executive Director
Public Staff - NCUC
Post Office Box 29520
Raleigh, North Carolina 27626-0520

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
H. B. Robinson Steam Electric Plant
2112 Old Camden Road
Hartsville, South Carolina 29550
Management

Mr. Virgil R. Autry, Director
South Carolina Department of Health
Bureau of Land & Waste Management
Division of Radioactive Waste

Mr. T. D. Walt
Plant General Manager
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant, Unit No. 2
3581 West Entrance Road
Hartsville, SC 29550

2600 Bull Street
Columbia, South Carolina 29201

Mr. J. W. Moyer
Director of Site Operations
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant, Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

Mr. Terry C. Morton
Manager
Performance Evaluation and
Regulatory Affairs CPB 7
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602-1551

Public Service Commission
State of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Mr. John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW.
Washington, DC 20037-1128

Mr. H. K. Chernoff
Supervisor, Licensing/Regulatory Programs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2

Mr. R. L. Warden
Manager - Regulatory Affairs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550-0790

ENCLOSURE

3581 West Entrance Road
Hartsville, South Carolina 29550

