

October 11, 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 THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE, SECTION XI, REGARDING SYSTEM PRESSURE TESTING - REQUEST NO. 25, REVISION 1, H. B. ROBINSON, UNIT 2 (TAC NO. MA9602)

Dear Mr. Young:

By letter dated July 28, 2000, you submitted Relief Request No. 25, Revision 1, seeking relief from the requirements of the ASME Code, Section XI, for the H. B. Robinson Steam Electric Plant, Unit 2, third 10-year inservice inspection interval. The Idaho National Engineering and Environmental Laboratory staff has reviewed the information that you provided in the subject request for relief, but needs additional information to complete their review on the submittal. The staff's RAI is enclosed.

This request was discussed with Mr. Albert Garrou of your staff on October 5, 2000, and a mutually agreeable target date was established for a response to the RAI of within 30 days of receipt of this RAI. Please note that the staff will make every effort to meet your requested date of February 1, 2000, but that date may be impacted by the time required to process the RAI response. The staff appreciates the efforts expended with respect to this matter.

If you should have any questions regarding this request, 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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RSubbaratnam	EDunnington	RCorreia
10/6/00	10/6/00	10/6/00
Yes/No	Yes/No	Yes/No

**REQUEST FOR ADDITIONAL INFORMATION**  
**ON THIRD 10-YEAR INTERVAL INSERVICE INSPECTION**  
**RELIEF REQUEST NO. 25, REVISION 1**  
**FOR**  
**CAROLINA POWER & LIGHT COMPANY**  
**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2**  
**DOCKET NUMBER: 50-261**

1. SCOPE

By letter dated July 28, 2000, the licensee, Carolina Power & Light Company, submitted Request for Relief No. 25, Revision 1, from the requirements of the ASME Code, Section XI, for the H. B. Robinson Steam Electric Plant, Unit 2, third 10-year inservice inspection (ISI) interval. The Idaho National Engineering and Environmental Laboratory (INEEL) staff has reviewed the information provided by the licensee in the subject request for relief.

2. INFORMATION REQUIRED

Based on the above review, the information requested below is required to complete the evaluation of the subject request for relief.

**Request for Relief No. 25 Revision 1** - ASME Code Case N-498-1, *Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems*, has been approved for use in Regulatory Guide 1.147, Revision 12. Code Case N-498-1 provides specific requirements [(a) 1-6, (b) 1-5, (c) 1-5] for Class 1, 2, and 3 system leakage/pressures tests which will be applied in lieu of the 10-year system hydrostatic tests. These include frequency of examination, boundaries subject to examination, hold times of examination, temperatures and pressure of examinations, components to be examined, and test instrumentation requirements. In accordance with 10 CFR 50.55a(a)(3)(ii), the licensee has proposed alternatives to various requirements specified in Code Case N-498-1. 10 CFR 50.55a(a)(3)(ii) requires the applicant to demonstrate that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. In order to evaluate this request for relief, provide the following information:

- a. Class 1 Systems - The licensee states that "...relief is requested for Class 1 systems to avoid placing the plant in a condition in violation of the Technical Specifications." Describe how the Technical Specifications will be violated if Code Case N-498-1 examination requirements are imposed on the subject Class 1 piping segments. Provide further information that describes all difficulties that may be associated with breaching the double isolation valves during operation, i.e., radiological conditions, problems with reseating of valves during operations, etc. In addition, for each of the Class 1 piping segments listed in the licensee's request, provide the piping diameter(s) and schedules, and the overall length of these segments.
- b. Class 2 Systems - The licensee states that "These pumps are capable of operating for extended periods under low flow conditions to perform their safety function, however, it is imprudent to incur the economic risk of extended operation of these pumps in the minimum flow recirculation mode during a test." It is understood that conditions may exist (heat loading, etc.) which may make running the subject pumps in mini-flow unsuitable. However, economic issues are not considered hardships for elimination of examination requirements. Provide clarification explaining why an extended run time of the subject pumps is considered a hardship. In addition, describe how the subject tests were performed during the first and

second intervals, i.e., by running of the pumps or by using externally applied hydro pumps via pressure taps, etc.

- c. Class 2 Systems - The licensee states that "...a proposed minimum ten (10) minute hold time is sufficient to detect small leaks that might originate from small through-wall cracks of the pressure boundary." The Staff agrees, provided the pressure boundary is non-insulated, and the examination conditions are such that adequate lighting, visibility, etc. are achievable (these are the current Code requirements). However, the Staff does not believe that a ten minute hold time will allow moisture from small leaks to penetrate/saturate insulated systems sufficiently to allow leakage to be identified and the source located. The Staff also believes that industry experience supports the Code Case requirement for a four (4) hour hold time for insulated systems. It is understood from the licensee's submittal that this request for relief is for insulated systems. Therefore, provide evidence supporting the claim that a minimum ten minute hold time is sufficient to detect small leaks that might originate from small through-wall cracks of the pressure boundary of insulated systems or present discussion that demonstrates why compliance with the applicable code case requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The schedule for timely completion of this review requires that the licensee provide, by the requested date, the above requested information and/or clarifications regarding the H. B. Robinson, Unit 2, Third 10-Year Interval Request for Relief No. 25, Revision 1.

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

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

cc:

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