



Serial: RNP-RA/03-0023

**MAR 03 2003**

Secretary, Office of the Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Attn: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

Director, Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

**TWENTY-DAY RESPONSE TO ORDER ESTABLISHING  
INTERIM INSPECTION REQUIREMENTS FOR REACTOR  
PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS**

Ladies and Gentlemen:

An order issued by the U. S. Nuclear Regulatory Commission (NRC) has been received for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The order, transmitted by letter dated February 11, 2003, and titled, "Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," states that the requirements of the order are effective immediately.

This response to the order is being provided in accordance with Sections IV.F and V of the order. Section V requires that, in accordance with 10 CFR 2.202, the licensee must submit an answer to the order within 20 days of its issuance. Section IV.F states that in its response the licensee shall notify the NRC if it is unable to comply with the requirements in Section IV or if such requirements are unnecessary. Section V of the order states that the answer may consent to the order. Section V of the order also states that the licensee may request additional time to request a hearing and that a statement of good cause for the extension must be included with that request.

HBRSEP, Unit No. 2, has taken actions to assure the integrity of the reactor pressure vessel (RPV) head and associated RPV head penetration nozzles. These actions include the performance of a bare-metal qualified visual examination of the RPV head and associated head penetration nozzles during Refueling Outage 20 (RO-20) in April of 2001. Inspections performed during RO-21 in October and November of 2002 included a bare-metal qualified visual examination of the RPV head and associated head penetration nozzles, and non-destructive examination (NDE) of the RPV head penetration nozzles. The RO-20 and RO-21 bare-metal qualified visual examinations of the RPV head and associated head penetration

nozzles did not identify evidence of leakage or cracking. The RO-21 NDE of the RPV head penetration nozzles found no service-related degradation.

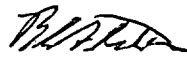
The previous inspection results and materiel condition of the HBRSEP, Unit No. 2, RPV head are being reviewed to determine if there is sufficient technical basis to warrant relaxation of the order requirements. Additionally, the option of procuring a replacement RPV head is being studied, with the replacement decision and timing being predominantly dependent on the costs of on-going inspections compared to the costs of replacing the RPV head. These reviews will be completed within 120 days of the date of the order, and if it is determined that a request for relaxation of the order requirements will be pursued, such request will be submitted at that time pursuant to Section IV.F of the order.

In response to questions provided during the NRC public meeting on February 24, 2003, the NRC indicated that requests for relaxation of the order requirements may be made later and do not need to be included in the 20-day response. HBRSEP, Unit No. 2, therefore consents to the order subject to: (1) The understanding that it may seek relaxation of the requirements in Section IV of the order upon completion of the 120-day review described above, if the criteria in Section IV.F are met; and (2) reservation of the right of HBRSEP, Unit No. 2, to request a hearing on any requirements of the order that may be subject to such a relaxation request.

The attachment to this letter provides an Affirmation in accordance with the provisions of Section 182a of the Atomic Energy Act of 1954.

If you have any questions concerning this matter, please contact Mr. C. T. Baucom.

Sincerely,



B. L. Fletcher III  
Manager - Support Services - Nuclear

CTB/ctb

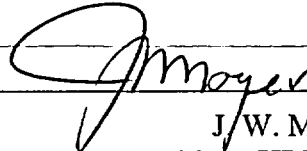
Attachment

c: Mr. L. A. Reyes, NRC, Region II  
Mr. C. Patel, NRC  
NRC Resident Inspector  
Assistant General Council for Materials Litigation and Enforcement, NRC  
Document Control Desk, NRC

**AFFIRMATION**

The information contained in letter RNP-RA/03-0023 is true and correct to the best of my information, knowledge and belief; and the sources of my information are officers, employees, contractors, and agents of Carolina Power and Light Company. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3 March 2003



J.W. Moyer  
Vice President, HBRSEP, Unit No. 2