

February 6, 2004

LICENSEE: Carolina Power & Light Company (Also doing business as Progress Energy)

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

SUBJECT: SUMMARY OF THE SEPTEMBER 25, 2003, MEETING WITH CAROLINA POWER & LIGHT COMPANY TO DISCUSS REQUEST FOR RELAXATION FROM THE ORDER FOR ESTABLISHING INTERIM INSPECTION REQUIREMENTS FOR REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED-WATER REACTORS

On September 25, 2003, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting at the NRC Headquarters in Rockville, Maryland with Carolina Power & Light Company (the licensee). The purpose of this meeting was to discuss the licensee's request for relaxation from the NRC order for establishing interim inspection requirements for reactor pressure vessel (RPV) heads at pressurized-water reactors (PWRs). The list of attendees is attached. The meeting handouts provided by the licensee have been placed in ADAMS (ADAMS No. ML032729357).

The NRC Order EA-03-009 requires plants such as H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP2) that are in the High Susceptibility category to perform the following during every refueling outage:

1. Bare-metal visual examination of 100 percent of the RPV head surface, and either:
  - 2a. Ultrasonic testing of each RPV head penetration nozzle (i.e., nozzle base material) from 2 inches above the J-groove weld to the bottom of the nozzle and an assessment to determine if leakage has occurred into the interference fit zone, OR
  - 2b. Eddy current testing or dye penetrant testing of the wetted surface of each J-groove weld and RPV head penetration nozzle base material to at least 2 inches above the J-groove weld.

The HBRSEP2 RPV head was examined by the licensee during the last two refueling outages. During the last refueling outage in October 2002 (RO-21), the licensee performed a bare-metal visual examination of the RPV head surface and a non-destructive examination (NDE) of the RPV head penetration nozzles.

The RO-21 inspection did not identify evidence of RPV head penetration nozzle leakage or primary water stress corrosion cracking. Additionally, the NDE of the RPV head penetrations found no evidence of service-related degradation. One recordable indication was identified that did not require repair.

Based on previous inspection results and the material condition of the RPV head, on August 15, 2003, the licensee requested a relaxation of the requirements in Section IV of NRC Order EA-03-009 that established interim inspection requirements for RPV heads at PWRs.

The licensee has proposed to perform only a bare-metal visual examination of 100 percent of the RPV head surface during the next refueling outage, which is currently planned for April 2004. The licensee requested a relaxation from NDE of RPV head penetration nozzles and J-groove welds only for the next refueling outage. The RPV head at HBRSEP2 is scheduled to be replaced in October 2005 during a refueling outage.

The licensee stated that two successive bare-metal visual examinations, NDE conducted in the previous refueling outage, review of the material and fabrication techniques used at HBRSEP2, statistical analysis along with deterministic and probabilistic analyses, and proposed bare-metal visual examination during the next refueling outage support the conclusion that the one-time relaxation of the non-visual NDE inspection will not result in any measurable impact to operational safety of HBRSEP2.

This meeting was requested by the licensee as a preliminary step to familiarize the NRC staff with the licensee's basis for the proposed request. The NRC staff found the meeting beneficial. However, the NRC staff cautioned the licensee that the staff had to review its request very carefully as it may set up a precedent for future actions from the staff.

*/RA/*

Chandu P. Patel, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Attachment: Attendance list

cc w/attachment: See next page

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Dated: February 6, 2004

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**ATTENDANCE LIST**  
**NUCLEAR REGULATORY COMMISSION STAFF MEETING**  
**WITH CAROLINA POWER & LIGHT**  
**AT NRC HEADQUARTERS**  
**SEPTEMBER 25, 2003**

<u>Name</u>	<u>Organization</u>
Chandu Patel	NRC/NRR/DLPM
Allen Howe	NRC/NRR/DLPM
Curt Castell	CP&L
Chuck Baucom	CP&L
Chris Burton	CP&L
Chris Church	CP&L
Erdal Caba	CP&L
Steve Hunt	Dominion Engineering, Inc.
Mike Melton	Arizona Public service
Jack Lareau	Westinghouse
Warren Bamford	Westinghouse
Glenn White	Dominion Engineering
Daniel Horner	McGraw Hill
Leslie Miller	NRC/NRR/DLPM/LPD2
Nadiyah Morgan	NRC/NRR/DLPM/LPD2
Dana Covill	Progress Energy
Vaughn Wagoner	Progress Energy
Robert Perdue	Westinghouse
Z. Bart Fu	NRC/NRR/DE/EMCB
Allen Hiser	NRC/NRR/DE/EMCB
Bill Bateman	NRC/NRR/DE/EMCB
Terence Chan	NRC/NRR/DE/EMCB
Chris Grimes	NRC/NRR/DE

H. B. Robinson Steam Electric Plant, Unit No. 2  
Carolina Power & Light Company

cc:

Steven R. Carr  
Associate General Counsel - Legal  
Department  
Progress Energy Service Company, LLC  
Post Office Box 1551  
Raleigh, North Carolina 27602-1551

Ms. Margaret A. Force  
Assistant Attorney General  
State of North Carolina  
Post Office Box 629  
Raleigh, North Carolina 27602

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

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

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

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

J. F. Lucas  
Manager - Support Services - Nuclear  
H. B. Robinson Steam Electric Plant,  
Unit No. 2  
Carolina Power & Light Company  
3581 West Entrance Road  
Hartsville, South Carolina 29550

Mr. C. T. Baucom  
Supervisor, Licensing/Regulatory Programs  
H. B. Robinson Steam Electric Plant,  
Unit No. 2  
Carolina Power & Light Company  
3581 West Entrance Road  
Hartsville, South Carolina 29550

Ms. Beverly Hall, Section Chief  
N.C. Department of Environment  
and Natural Resources  
Division of Radiation Protection  
3825 Barrett Dr.  
Raleigh, North Carolina 27609-7721

Mr. Robert P. Gruber  
Executive Director  
Public Staff - NCUC  
4326 Mail Service Center  
Raleigh, North Carolina 27699-4326

Mr. Henry H. Porter, Assistant Director  
South Carolina Department of Health  
Bureau of Land & Waste Management  
2600 Bull Street  
Columbia, South Carolina 29201

Mr. James W. Holt  
Manager  
Performance Evaluation and  
Regulatory Affairs PEB 7  
Progress Energy  
Post Office Box 1551  
Raleigh, North Carolina 27602-1551

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

Mr. J. W. Moyer, Vice President  
H. B. Robinson Steam Electric Plant  
Unit No. 2  
Carolina Power & Light Company  
3581 West Entrance Road  
Hartsville, South Carolina 29550-0790