



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

September 5, 2008

Mr. Thomas D. Walt
Vice President
Carolina Power and Light Company
H.B. Robinson Steam Electric Plant Unit 2
3581 West Entrance Road
Hartsville, SC 29550

**SUBJECT: ROBINSON NUCLEAR PLANT, UNIT 2 - NOTIFICATION OF INSPECTION
AND REQUEST FOR INFORMATION**

Dear Mr. Walt:

From October 6 to 10, 2008, the NRC will perform the baseline in-service inspection (ISI) at the Robinson Nuclear Plant, Unit 2 in accordance with NRC Inspection Procedure 71111.08. Experience has shown that this inspection is resource intensive both for the NRC inspectors and your staff. In order to minimize the impact to your on-site resources and to ensure a productive inspection, we have enclosed a request for documents needed for this inspection. These documents have been divided into two groups. The first group (Section A of the enclosure) identifies information to be provided prior to the inspection to ensure that the inspectors are adequately prepared. The second group (Section B of the enclosure) identifies the information the inspectors will need upon arrival at the site. It is important that all of these documents are up to date, and complete, in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Garrett Sanders (843-847-1427) of your organization. Our inspection dates are subject to change based on your updated schedule of outage activities. If there are any questions about this inspection or the material requested, please contact the lead inspector, Louis Lake, at (404) 562-4683 (Louis.Lake@nrc.gov).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

George T. Hopper, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 50-261
License No. DPR-23

(cc: w/encl – See Page 3)

cc w/encl:
Brian C. McCabe
Manager
Nuclear Regulatory Affairs
Progress Energy
Electronic Mail Distribution

Eric McCartney
Director Site Operations
Carolina Power & Light Company
Electronic Mail Distribution

R. J. Duncan, II
Vice President
Nuclear Operations
Carolina Power & Light Company
Electronic Mail Distribution

Ernest J. Kapopoulos, Jr.
Plant General Manager
Carolina Power & Light Company
Electronic Mail Distribution

Paul Fulford
Manager
Performance Evaluation and Regulatory
Affairs PEB5
Carolina Power & Light Company
Electronic Mail Distribution

Curt A. Castell
Supervisor
Licensing/Regulatory Programs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant
3581 West Entrance Road
Hartsville, SC 29550

C. T. Baucom
Manager
Support Services - Nuclear
Carolina Power & Light Company
Electronic Mail Distribution

Susan E. Jenkins
Director, Division of Waste Management
Bureau of Land and Waste Management
S.C. Department of Health and
Environmental Control
Electronic Mail Distribution

R. Mike Gandy
Division of Radioactive Waste Mgmt.
S.C. Department of Health and
Environmental Control
Electronic Mail Distribution

Beverly O. Hall
Chief, Radiation Protection Section
Department of Environmental Health
N.C. Department of Environmental
Commerce & Natural Resources
Electronic Mail Distribution

David T. Conley
Associate General Counsel
Legal Dept.
Progress Energy Service Company, LLC
Electronic Mail Distribution

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

Chairman
North Carolina Utilities Commission
Electronic Mail Distribution

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

Public Service Commission
State of South Carolina
P.O. Box 11649
Columbia, SC 29211

S. D. West
Superintendent Security
H. B. Robinson Steam Electric Plant
Progress Energy
Electronic Mail Distribution

Senior Resident Inspector
Carolina Power and Light Company
H. B. Robinson Steam Electric Plant
U.S. NRC
2112 Old Camden Rd
Hartsville, SC 29550

CP&L

4

Letter to Thomas D. Walt from George Hopper dated September 5, 2008

SUBJECT: ROBINSON NUCLEAR PLANT, UNIT 2 - NOTIFICATION OF INSPECTION
AND REQUEST FOR INFORMATION

Distribution w/encl:

RIDSNRRDIRS

PUBLIC

M. Vaaler, NRR (PM - Harris)

September 5, 2008

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2

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George T. Hopper, Chief
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Docket No. 50-261
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(cc: w/encl – See Page 3)

☒ PUBLICLY AVAILABLE

☐ NON-PUBLICLY AVAILABLE

☐ SENSITIVE

☒ NON-SENSITIVE

ADAMS: ☒ Yes ACCESSION NUMBER: _____

☒ SUNSI REVIEW COMPLETE

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| OFFICE | RII:DRS | RII:DRS | | | | | |
| SIGNATURE | /RA/ | /RA/ | | | | | |
| NAME | Louis Lake | George Hopper | | | | | |
| DATE | 09/05/2008 | 09/05/2008 | 9/ /2008 | 9/ /2008 | 9/ /2008 | 9/ /2008 | 9/ /2008 |
| E-MAIL COPY? | YES NO | YES NO | YES NO | YES NO | YES NO | YES NO | YES NO |

OFFICIAL RECORD COPY DOCUMENT NAME: S:\DRS\ENG BRANCH 3\ISI REQUEST FOR INFORMATION
LETTERS\2008\ROBINSON_U2_ISI_INFO_REQUEST_2008004_LFL.DOC

INSERVICE INSPECTION DOCUMENT REQUEST

Inspection Dates: October 6 - 10, 2008

Inspection Procedures: IP 7111108 "In-service Inspection (ISI) Activities"

Inspection Report: The results of this inspection will be documented in the NRC Resident Inspector Integrated Inspection Report 2008005.

Inspectors: Louis Lake; Senior Reactor Inspector (Lead Inspector)

A. Information Requested for the In-Office Preparation Week

The following information should be sent to the Region II office in hard copy (or electronic format CD - preferred), in care of Louis Lake by September 26, 2008, to facilitate the selection of specific items that will be reviewed during the onsite inspection week. The inspector will select specific items from the information requested below and then request from your staff additional documents needed during the onsite inspection week (section B of this enclosure). We ask that the specific items selected from the lists be available and ready for review on the first day of inspection. *Please provide requested documentation electronically if possible. If requested documents are large and only hard copy formats are available, please inform the inspector(s), and provide subject documentation during the first day of the onsite inspection. If you have any questions regarding this information request, please call the inspector as soon as possible.

A.1 ISI / Welding Programs and Schedule Information

- a) A detailed schedule (including preliminary dates) of:
 - i) Nondestructive examinations (NDEs) planned for Class 1 & 2 systems and containment, performed as part of your ASME Section XI, Risk Informed (if applicable), and augmented ISI Programs during the upcoming outage.

Provide a status summary of the NDE inspection activities vs. the required inspection period percentages for this Interval by category per ASME Section XI, IWX-2400 (Do not provide separately if other documentation requested contains this information)
 - ii) Reactor pressure vessel head (RPVH) examinations planned for the upcoming outage.
 - iii) Examinations planned for Alloy 82/182/600 components that are not included in the Section XI scope. (if applicable)
 - iv). Examinations planned as part of your Boric Acid Corrosion Control Program (Mode 3 walkdowns, bolted connection walkdowns, etc.)

Enclosure

- v) Welding activities that are scheduled to be completed during the upcoming outage (ASME Class 1, 2, or 3 structures systems or components (SSCs))
- b) A copy of ASME Section XI Code Relief Requests and associated NRC Safety Evaluations applicable to the examinations identified above.
- c) A list of NDE reports (ultrasonic, radiography, magnetic particle, dye penetrant, visual VT-1, VT-2, and VT-3) which have identified recordable indications (geometric or flaw) on Code Class 1 & 2 systems since the beginning of the last refueling outage. Also, include in the list the NDE reports with recorded indications in the RPVH penetration nozzles which have been accepted for continued service. The list of NDE reports should include a brief description of the SSC where the recordable indication was identified.
- d) A list with a brief description (e.g. system, material, pipe size, weld number, and NDE performed) of the welds in Code Class 1 and 2 systems which have been fabricated due to component repair/replacement activities since the beginning of the last refueling outage, or are planned to be fabricated this refueling outage.
- e) If reactor vessel weld examinations required by the ASME Code are scheduled to occur during the upcoming outage, provide a detailed description of the welds to be examined, and the extent of the planned examination. Please also provide reference numbers for applicable procedures that will be used to conduct these examinations.
- f) Copy of any 10 CFR Part 21 reports applicable to your SSCs within the scope of Section XI of the ASME Code that have been identified since the beginning of the last refueling outage.
- g) A list of any temporary non-code repairs in service (e.g., pinhole leaks).
- h) Please provide copies of the most recent self assessments for the ISI, Welding, and Alloy 600 Programs.

A.2 Reactor Pressure Vessel Head (RPVH)

- a) Provide the detailed scope of the planned NDE of the reactor vessel head which identifies the types of NDE methods to be used on each specific part of the vessel head to fulfill NRC commitments made in response to NRC Bulletin 2002-02 and NRC Order EA-03-009. Also, include examination scope expansion criteria and planned expansion sample sizes if relevant indications are identified. (If applicable)

- b) A list of the standards and/or requirements that will be used to evaluate indications identified during NDE of the reactor vessel head (e.g. the specific industry or procedural standards which will be used to evaluate potential leakage and/or flaw indications).

A.3 Boric Acid Corrosion Control Program (BACCP)

- a) Copy of the procedures that govern the scope, equipment and implementation of the inspections required to identify boric acid leakage and the procedures for boric acid leakage/corrosion evaluation.
- b) Please provide a list of leaks (including code class of the components) that have been identified since the last refueling outage and associated corrective action documentation. If during the last cycle, the Unit was shutdown, please provide documentation of containment walk-down inspections performed as part of the BACCP.
- c) Please provide a copy of the most recent self-assessment performed for the BACCP.

A.4 Steam Generator (SG) Inspections (if applicable)

- a) A detailed schedule of:
 - i) SG tube inspection, data analyses, and repair activities for the upcoming outage. (If occurring)
 - ii) SG secondary side inspection activities for the upcoming outage. (If occurring)
- b) Please provide a copy of your SG ISI Inspection Program and Plan. Please include a copy of the Operational Assessment from last outage, and a copy of the following documents as they become available:
 - i) Degradation Assessment
 - ii) Condition Monitoring Assessment
- c) If you are planning on modifying your Technical Specifications such that they are consistent with TSTF-449, please provide copies of your correspondence with the NRC regarding deviations from the STS.
- d) Copy of SG history documentation given to vendors performing eddy current (ET) testing of the SGs during the upcoming outage.
- e) Copy of SG Eddy Current Data Analyst Guidelines, and Site Validated Eddy Current Technique. Additionally, please provide a copy of EPRI Appendix H Eddy Current Technique Qualification Records.

Enclosure

- f) Identify and quantify any SG tube leakage experienced during the previous operating cycle. Also provide documentation identifying which SG was leaking and corrective actions completed or planned for this condition. (If applicable)
- g) Provide past history of the condition and issues pertaining to the secondary side of the steam generators (including items such as loose parts, fouling, top of tube sheet condition, crud removal amounts, etc.)
- h) Please provide copies of your most recent self assessments of the SG monitoring, loose parts monitoring, and secondary side water chemistry control programs.
- i) Please also indicate where the primary, secondary, and resolution analyses are scheduled to take place.
- j) Please provide a summary of the scope of the SG ISI examinations, including examination methods such as Bobbin, Rotating Pancake, or Plus Points, and the percentage of tubes to be examined. **Do not provide these documents separately if already included in other information requested.*

A.5 Additional information related to all ISI activities

- a) A list with a brief description of ISI, BACCP, and RPV Head issues (e.g., condition reports) entered into your corrective action program since the beginning of the last refueling outage. For example, a list based upon data base searches using key words related to piping degradation such as: ISI, ASME Code, Section XI, NDE, cracks, wear, thinning, leakage, rust, corrosion, boric acid or errors in piping.
- b) Please provide names and phone numbers for the following program leads:

 ISI contacts (Examination, planning)
 Containment Exams
 RPVH Exams
 Snubbers and Supports
 Repair and Replacement program manager
 Licensing Contact
 Site Welding Engineer
 Boric Acid Corrosion Control Program
 SG Inspection Activities (site lead and vendor contact)

B. Information to be provided on-site to the inspector at the entrance meeting (October 6, 2008)

B.1 ISI / Welding Programs and Schedule Information

- a) Updated schedules for ISI / NDE activities, including SG ISI, planned welding activities, and schedule showing contingency repair plans, if available.

Enclosure

- b) For ASME Class 1 and 2 welds selected by the inspector from the lists provided from section A of this enclosure, please provide copies of the following documentation for each subject weld:
- i) Weld data sheet (traveler)
 - ii) Weld configuration and system location
 - iii) Applicable Code Edition and Addenda for weldment
 - iv) Applicable Code Edition and Addenda for welding procedures
 - v) Applicable weld procedures (WPS) used to fabricate the welds
 - vi) Copies of procedure qualification records (PQRs) supporting the WPS from B.1.b.v
 - vii) Copies of mechanical test reports identified in the PQRs above
 - viii) Copies of the nonconformance reports for the selected welds (If Applicable)
 - ix) Radiographs of the selected welds and access to equipment to allow viewing radiographs (If RT was performed)
 - x) Copies of the pre-service examination records for the selected welds.
 - xi) Copies of welder performance qualifications records applicable to WPS, including documentation that welder maintained proficiency in the applicable welding processes specified in the WPS (At least six months prior to date subject work)
 - xii) Copies of NDE personnel qualifications (VT, PT, UT, RT) *As applicable*
- c) For the ISI related corrective action issues selected by the inspector from section A of this enclosure, provide a copy of the corrective actions and supporting documentation.
- d) For the NDE reports with recordable indications on Code Class 1 & 2 systems selected by the inspector from section A above, provide a copy of the examination records, examiner qualification records, and associated corrective action documents.
- e) A copy of (or ready access to) most current revision of the ISI Program Manual and Plan for the current Interval.
- f) For the NDEs selected by the inspector from section A of this enclosure, provide copy of the NDE procedures used to perform the examinations (including calibration and flaw characterization/sizing procedures). For ultrasonic examination procedures qualified in accordance with ASME Code, Section XI, Appendix VIII, provide documentation supporting the procedure qualification (e.g., the EPRI performance demonstration qualification summary sheets). Also, include documentation of the specific equipment to be used (e.g., ultrasonic unit, cables, and transducers including serial numbers) and NDE personnel qualification records.

B.2 Reactor Pressure Vessel Head (RPVH)

- a) Provide all NDE personnel qualification records for the examiners who will perform examinations of the RPVH (i.e. volumetric, surface, and visual exams).
- b) Provide a drawing showing a top view of the RPVH and CRDM nozzle locations (drawn to scale).
- c) Provide “as built” drawings for the CRDM nozzle attachment welds (drawn to scale).
- d) Copy of NDE reports from the last RPVH examination (as applicable).
- e) If available, provide a copy of evaluation or calculation demonstrating that the scope of the visual examination of the upper head will meet the 95% minimum coverage required by NRC Order EA-03-009 (If a visual examination is planned for the upcoming refueling outage).
- f) Provide a copy of the procedures that will be used to inspect pressure-retaining components above the RPVH that could be the source of boric acid deposits on the head. If no explicit procedures exist which govern this activity, provide a description of the process to be followed including personnel responsibilities and expectations.
- g) Provide a copy of the updated calculation of effective degradation years (EDY) for the RPVH susceptibility category.
- h) Provide copy of the vendor qualification report(s) that demonstrates the detection capability of the NDE equipment used for the RPVH examinations. Also, identify any changes in equipment configurations used for the RPVH examinations which differ from that used for in the vendor qualification report(s).
- i) Copy of NDE procedures that will be used for all NDE examinations.
- j) Copy of NDE equipment certifications (e.g. Liquid Penetrant consumables and Ultrasonic probe certification reports).
- k) Copy of NDE equipment calibration records.
- l) Provide access to review acquired volumetric and visual examination data 9as applicable).

B.3 Boric Acid Corrosion Control Program (BACCP)

- a) Please provide boric acid walk down inspection results, an updated list of boric acid leaks identified so far this outage, associated corrective action documentation, and overall status of planned boric acid inspections.

Enclosure

- b) Please provide any engineering evaluations completed for boric acid leaks identified since the end of the last refueling outage. Please include a status of corrective actions to repair and/or clean these boric acid leaks. Please specify which known leaks, if any, have remained in service or will remain in service as active leaks.
- c) In accordance with NRC inspection procedure 71111.08, the inspector(s) would like to conduct an independent boric acid walk down of the Reactor Building early in the inspection week. Please have knowledgeable BACCP staff available to accompany the inspector during the walk down.

B.4 Information related to Steam Generator (SG) inspections

NONE

B.5 Codes and Standards

- a) Ready access to: (i.e., copies provided to the inspector to use for the duration of the inspection at the on-site inspection location, or room number and location where available).
 - i) Applicable editions of the ASME Code (Sections V, IX and XI) for the in-service inspection program and the repair/replacement program.
 - ii) EPRI and industry standards referenced in the procedures used to perform ISI examinations.

Inspectors Contact Information:

Louis Lake
Senior Reactor Inspector
404-562-4683
Louis Lake@nrc.gov

Mailing Address
Attn: Louis Lake
61 Forsyth Street, SW Suite 23 T85
Atlanta, GA 30303

Enclosure