



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 30, 2009

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

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – REQUEST FOR
RELIEF FROM ASME CODE, SECTION XI, SUBSECTION IWE
REQUIREMENTS FOR CONTAINMENT INSPECTIONS (TAC NO. MD8509)

Dear Mr. McCartney:

By letter dated April 4, 2008, as supplemented by letter dated January 30, 2009, Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. (the licensee), submitted a request for relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) at the H.B. Robinson Steam Electric Plant, Unit 2 (HBRSEP) for the second 10-year containment inservice inspection (CISI) interval, which began on September 9, 2008, and ends on September 8, 2018.

Relief requests (RRs) IWE/IWL-RR-01, IWE/IWL-RR-02, and IWE/IWL-RR-03 pertain to relief from certain requirements of the ASME Code, Section XI, Subsection IWE, 2001 Edition with 2003 Addenda, with regard to containment inspection examinations for the second 10-year CISI interval at HBRSEP. These RRs relate to general visual examination of the insulated portion of the containment liner, general visual examination of the moisture barriers behind insulation, and successive examinations following a repair, respectively.

After initial review of the April 4, 2008, submittal, the U.S. Nuclear Regulatory Commission (NRC) staff issued a request for additional information (RAI) by letter dated September 4, 2008. In its RAI response submittal dated January 30, 2009, the licensee revised and re-submitted RRs IWE/IWL-RR-01 and IWE/IWL-RR-02 in their entirety, and withdrew RR IWE/IWL-RR-03. Accordingly, the NRC staff's final review is based on the licensee's January 30, 2009, submittal.

Based on the information provided in the application, as supplemented, the NRC staff concluded that the licensee's proposed alternatives will continue to provide an acceptable level of quality and safety and are, therefore, acceptable. Therefore, pursuant to Title 10 of the Code of Federal Regulations, Part 50, Section 55a(a)(3)(i), the NRC staff authorizes the CISI program alternatives proposed in RRs IWE/IWL-RR-01 and IWE/IWL-RR-02 for the second 10-year CISI interval at the H.B. Robinson Steam Electric Plant, Unit 2.

E. McCartney

- 2 -

The NRC staff's safety evaluation is enclosed. If you have any questions regarding this matter, please contact Marlayna Vaaler at (301) 415-3178.

Sincerely,

A handwritten signature in black ink, appearing to read "T. H. Boyce". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Thomas H. Boyce, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR RELIEF FROM ASME CODE, SECTION XI, SUBSECTION IWE

REQUIREMENTS FOR CONTAINMENT INSPECTIONS

CAROLINA POWER AND LIGHT COMPANY

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated April 4, 2008 (Reference 1), as supplemented by letter dated January 30, 2009 (Reference 2), Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. (the licensee), submitted a request for relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) at the H.B. Robinson Steam Electric Plant, Unit 2 (HBRSEP) for the second 10-year containment inservice inspection (CISI) interval.

Relief requests (RRs) IWE/IWL-RR-01, IWE/IWL-RR-02 and IWE/IWL-RR-03 pertain to relief from certain requirements of the ASME Code, Section XI, Subsection IWE, 2001 Edition with 2003 Addenda, with regard to containment inspection examinations for the second 10-year CISI interval at HBRSEP, which began on September 9, 2008, and ends on September 8, 2018. These RRs relate to general visual examination of the insulated portion of the containment liner, general visual examination of the moisture barriers behind insulation, and successive examinations following a repair, respectively.

After initial review of the April 4, 2008, submittal, the U.S. Nuclear Regulatory Commission (NRC) staff issued a request for additional information (RAI) by letter dated September 4, 2008 (Reference 3). In its RAI response submittal dated January 30, 2009, the licensee revised and re-submitted RRs IWE/IWL-RR-01 and IWE/IWL-RR-02 in their entirety, and withdrew RR IWE/IWL-RR-03. Accordingly, the NRC staff's final review is based solely on the licensee's January 30, 2009, submittal.

The licensee submitted these RRs pursuant to Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Section 55a(a)(3)(i), on the basis that the proposed alternatives continue to provide an acceptable level of quality and safety. The licensee was previously authorized similar relief for its first CISI interval by letter dated July 26, 1999 (Reference 4). This safety evaluation addresses the merits of RRs IWE/IWL-RR-01 and IWE/IWL-RR-02 for relief from ASME Code requirements as proposed by the licensee pursuant to 10 CFR 50.55a(a)(3)(i).

Enclosure

2.0 REGULATORY REQUIREMENTS

In accordance with 10 CFR 50.55a(g)(4), components that are classified as Class MC pressure retaining components and their integral attachments, and components that are classified as Class CC pressure retaining components and their integral attachments must meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plants Components." The regulations require that all inservice examinations conducted during the first 10-year interval, and subsequent intervals, comply with the requirements in the latest edition and addenda of ASME Code, Section XI, incorporated by reference into 10 CFR 50.55a(b) on the date 12 months prior to the start of the 10-year interval, subject to the limitation listed in 10 CFR 50.55a(b)(2)(vi) and the modifications listed in 10 CFR 50.55a(b)(2)(viii) and (b)(2)(ix), to the extent practical within the limitation of design, geometry, and materials of construction of the components. For HBRSEP, the code of record for the second 10-year CISI interval is the 2001 Edition with 2003 Addenda of Section XI of the ASME Code.

Alternatives to ASME Code requirements may be authorized or reliefs granted by the NRC pursuant to 10 CFR 50.55a(a)(3)(i), 10 CFR 50.55a(a)(3)(ii), or 10 CFR 50.55a(g)(6)(i). In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for the facility.

It is stated in 10 CFR 50.55a(a)(3)(i) that proposed alternatives to the requirements of paragraphs (c), (d), (e), (f), (g) and (h) of 10 CFR 50.55a, "Codes and Standards," or portions thereof, may be used when authorized by the Director of the Office of Nuclear Reactor Regulation, provided the applicant demonstrates that the proposed alternatives would continue to provide an acceptable level of quality and safety. Accordingly, the licensee has submitted RRs IWE/IWL-RR-01 and IWE/IWL-RR-02 pursuant to 10 CFR 50.55a(a)(3)(i).

3.0 TECHNICAL EVALUATION

3.1 RR IWE/IWL-RR-01: Visual Examination of Insulated Containment Liner

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee has requested relief from the requirements of Table IWE-2500-1, Examination Category E-A, Item Number E1.11 of the ASME Code, Section XI, 2001 Edition with 2003 Addenda for general visual examination of the accessible surface areas of the containment liner that are covered by insulation panels, which is classified as Class MC.

3.1.1 Component Identification:

Code Class:	Class MC and metallic liners of Class CC components
Code Reference:	ASME Code, Section XI, Table IWE-2500-1
Examination Category:	E-A
Item Number:	E1.11
Description:	Insulated portion of containment liner only
Component Number:	Insulated portion of containment liner only

3.1.2 Applicable ASME Code Edition and Addenda:

The applicable Code of Record for the second CISI interval (September 9, 2008, through September 8, 2018) at HBRSEP is the ASME Code, Section XI, 2001 Edition, 2003 Addenda, Subsection IWE (hereafter referred to as the 2001 ASME Code) subject to the regulatory modifications in 10 CFR 50.55a(b)(2)(ix)(A), (b)(2)(ix)(B), and (b)(2)(ix)(F) through (b)(2)(ix)(I), as applicable.

3.1.3 Applicable ASME Code Requirement from which Relief is Requested:

Table IWE-2500-1, Examination Category E-A, Item Number E1.11 of the 2001 ASME Code requires general visual examination of 100 percent of the accessible surface areas of the containment liner during each examination period of the inspection interval against the IWE-3510, "Standards for Examination Category E-A, Containment Surfaces." acceptance standard, which applies to Class MC and metallic liners of Class CC components. The licensee is requesting relief from this requirement for the accessible surface areas of the containment liner that are covered by insulation panels, as indicated in Figure 1 of the January 30, 2009, submittal.

3.1.4 Proposed Alternative and Duration:

The licensee stated that its IWE/IWL Program/Plan identifies 62 insulation panels at the interface between the containment concrete wall and the containment floor slab (above the base mat) at the 228-foot elevation. The licensee proposed to remove approximately one-third of the panels at the base mat interface and perform a general visual examination of the containment liner during each inspection period of the second 10-year CISI interval. The licensee stated that this will ensure that over the second 10-year CISI interval, a 100-percent general visual examination of the liner at the base mat elevation will have been performed.

In addition, the licensee has proposed that during the second 10-year CISI interval, when an insulation panel at any elevation is removed for maintenance activities, a general visual examination of the liner beneath that panel will be performed.

RR IWE/IWL-RR-01 is requested for the second 10-year CISI interval at HBRSEP, which began on September 9, 2008, and ends on September 8, 2018.

3.1.5 Licensee's Basis and Justification for the Relief:

In accordance with 10 CFR 50.55a(a)(3)(i), the licensee has requested relief for HBRSEP on the basis that the proposed alternative examinations, in conjunction with the examinations that occurred during the first 10-year CISI interval, continue to provide an acceptable level of quality and safety. The licensee also stated that similar relief was previously authorized for the first 10-year CISI interval at HBRSEP by an NRC Safety Evaluation dated July 26, 1999.

Table IWE-2500-1, Examination Category E-A, does not address an insulated containment liner. The containment liner at HBRSEP is partially insulated and covered by a stainless steel sheathing to provide thermal protection for the liner during a design basis accident, which form part of the defense-in-depth philosophy of the containment

liner. The licensee stated that removal and reinstallation of the insulation sheathing panels has been determined to result in hardship and unusual difficulty.

The licensee affirmed that during the first 10-year CISI interval, inspections of the containment liner were performed under 108 insulation panels that were removed. This included the planned removal of the entire inventory of 62 panels at the base mat elevation, for which both liner and moisture barrier inspections were performed, as well as removal of 46 panels at higher elevations for various reasons, at which time a liner inspection was performed for each panel.

The licensee stated that review of the data for the liner inspections associated with the first 10-year CISI interval indicated degradation of the coating, which required coating removal and reapplication. Subsequent ultrasonic and visual examinations after coating removal revealed that the minimum liner wall thickness was not violated and remained acceptable against the procedural criteria. Liner coatings were reapplied and as-left examinations were performed prior to reinstalling the panel insulation and sheathing.

Based on the above, the licensee concluded that the proposed alternative examinations for the portions of the containment liner covered by insulation panels, in conjunction with the results of examinations performed during the first CISI interval, continue to provide an acceptable level of quality and safety.

3.1.6 Staff Evaluation:

In lieu of performing a general visual examination of 100 percent of the accessible surface areas of the containment liner that are covered by insulation panels during each examination period of the second 10-Year CISI interval, as required by the 2001 ASME Code, Table IWE-2500-1, Examination Category E-A, Item E1.11, the licensee proposed alternative examinations in this RR. The proposed alternative provides for removal of approximately one-third of the 62 insulation panels at the base mat interface level, and the performance of a general visual examination of the containment liner, during each inspection period of the CISI interval.

This ensures that a 100 percent general visual examination of the liner surfaces at the level considered, based on industry operating experience of containment liners, to be most susceptible to degradation will be performed over the course of the second 10-year CISI interval. In its proposed alternative, the licensee also stated that it will perform opportunistic general visual examinations of the containment liner beneath the insulation panels whenever panels at any elevation are removed for other maintenance activities.

The NRC staff, by letter dated July 26, 1999, previously authorized a similar RR for the first 10-year CISI interval at HBRSEP. It is stated in this letter that: 1) the specification for the insulation requires that the exposed surface be impervious to water; 2) suitable water seals are provided at points where the insulation ends are exposed to the containment atmosphere; and 3) that sealant is used to prevent water leakage to the containment liner. Therefore, the insulated area is reasonably sealed to prevent the intrusion of moisture against the covered containment surfaces.

Results of the licensee's inspections of the containment liner under 108 insulation panels that were removed during the first 10-year CISI interval indicated degradation of the coating, which was removed and reapplied. Ultrasonic and visual examination after

coating removal found that the containment liner thickness continued to meet the acceptance criteria for minimum wall thickness. The sample of panels that were removed for liner inspection included the planned removal of the entire inventory of 62 panels at the lowest containment elevation and an additional 46 panels at higher elevations (including areas around electrical and mechanical penetrations, airlock, equipment hatch, etc.) that were removed for various maintenance reasons.

Thus, the panels that were removed for liner inspection provided a reasonable sample that covered the critical insulated liner areas, which are more likely to be susceptible to degradation. From the NRC's July 26, 1999, letter, the estimated total number of insulation panels on the containment surfaces is approximately 2000, whereby the sample size of the panels that were removed for liner inspections during the first CISI interval is on the order of 5 percent. The alternative examinations proposed by the licensee for the second CISI interval cover inspection of a similar sample of critical insulation liner areas over the course of the 10-year interval. The staff also notes that the regulatory modifications in 10 CFR 50.55a(b)(2)(ix)(A), (b)(2)(ix)(B), and (b)(2)(ix)(F) through (b)(2)(ix)(I) that apply to the 2001 ASME Code shall be satisfied, as applicable.

Therefore, the staff finds that the licensee's proposed alternative examinations during the second 10-year CISI interval for the portion of containment liner surfaces covered by reasonably sealed insulation panels, in conjunction with the findings of similar examinations performed during the first 10-year CISI interval, and the applicable regulatory modifications found in 10 CFR 50.55a(b)(2)(ix) for the 2001 ASME Code, would continue to provide an acceptable level of quality and safety. Therefore, the staff concludes that RR IWE/IWL-RR-01 can be authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the second 10-year CISI interval at HBRSEP.

3.2 RR IWE/IWL-RR-02: Visual Examination Of Moisture Barriers

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee has requested relief from the requirements of Table IWE-2500-1, Examination Category E-A, Item Number E1.30 of the ASME Code, Section XI, 2001 Edition with 2003 Addenda for general visual examination of the containment moisture barriers that are covered by liner insulation panels, which is classified as Class MC.

3.2.1 Component Identification:

Code Class:	Class MC and metallic liners of Class CC components
Code Reference:	ASME Code, Section XI, Table IWE-2500-1
Examination Category:	E-A
Item Number:	E1.30
Description:	Moisture barriers behind insulated portion of containment liner
Component Number:	Moisture barriers behind insulated portion of containment liner

3.2.2 Applicable ASME Code Edition and Addenda:

The applicable Code of Record for the second CISI interval (September 9, 2008, through September 8, 2018) at HBRSEP is the ASME Code, Section XI, 2001 Edition, 2003 Addenda, Subsection IWE (hereafter referred to as the 2001 ASME Code) subject to the regulatory modifications in 10CFR50.55a(b)(2)(ix)(A), (b)(2)(ix)(B), and (b)(2)(ix)(F) through (b)(2)(ix)(I), as applicable.

3.2.3 Applicable ASME Code Requirement from which Relief is Requested:

Table IWE-2500-1, Examination Category E-A, Item Number E1.30 of the 2001 ASME Code requires general visual examination of 100 percent of the containment moisture barriers during each examination period of the inspection interval against the IWE-3510 acceptance standard, which applies to Class MC and metallic liners of Class CC components. The examination shall include moisture barrier materials intended to prevent intrusion of moisture into inaccessible areas of the pressure retaining metal containment shell or liner at concrete-to-metal interfaces and at metal-to-metal interfaces which are not seal-welded. Containment moisture barrier materials include caulking, flashing, and other sealants used for this application. The licensee is requesting relief from this requirement for the moisture barriers that are covered by the containment liner insulation panels, as indicated in Figure 2 of the January 30, 2009, submittal.

3.2.4 Proposed Alternative and Duration:

The licensee stated that its IWE/IWL Program/Plan identifies 62 insulation panels at the interface between the containment concrete wall and the containment floor slab (above the base mat) at the 228-foot elevation. The licensee proposed to remove approximately one-third of the panels at the base mat interface and perform a general visual examination of the moisture barriers during each inspection period of the second 10-year CISI interval. The licensee stated that this will ensure that over the second 10-year CISI interval, a 100-percent general visual examination of the moisture barriers at the base mat elevation will have been performed.

In addition, the licensee has proposed that during the second 10-year CISI interval, when an insulation panel at the 228-foot elevation level is removed for maintenance activities, a general visual examination of the moisture barrier will be performed.

RR IWE/IWL-RR-02 is requested for the second 10-year CISI interval at HBRSEP, which began on September 9, 2008, and ends on September 8, 2018.

3.2.5 Licensee's Basis and Justification for the Relief:

In accordance with 10 CFR 50.55a(a)(3)(i), the licensee has requested relief for HBRSEP on the basis that the proposed alternative examinations, in conjunction with the examinations that occurred during the first 10-year CISI interval, continue to provide an acceptable level of quality and safety. The licensee also stated that similar relief was previously authorized for the first 10-year CISI interval at HBRSEP by an NRC Safety Evaluation dated July 26, 1999.

Table IWE-2500-1, Examination Category E-A, does not address insulated containment liners. The containment moisture barrier at HBRSEP is covered by stainless steel sheathing and insulation to provide thermal protection for the carbon steel liner during a design basis accident. As shown in Figure IWE-2500-1, and noted in Table IWE-2500-1, moisture barrier materials are intended to prevent intrusion of moisture against inaccessible areas of the pressure-retaining metal containment shell or liner at concrete-to-metal interfaces and at metal-to-metal interfaces which are not seal-welded.

For HBRSEP, the moisture barrier that meets this definition is the epoxy joint filler that interfaces with the concrete-to-containment liner interface at the 228-foot elevation, the details of which are shown in Figures 1 and 2 of the January 30, 2009, submittal. The licensee stated that as the containment internal moisture barrier is covered with a layer of insulation and stainless steel sheathing, the removal and reinstallation of the insulation sheathing panels has been determined to result in hardship and unusual difficulty.

The licensee affirmed that during the first 10-year CISI interval, 100 percent of the moisture barrier was inspected. The licensee stated that review of the results of the moisture barrier inspections indicated degradation of the moisture barrier in some locations, which required removal and reapplication of the epoxy joint filler. Subsequent visual examination of the containment liner after moisture barrier removal revealed that the minimum wall thickness of the liner behind the moisture barrier was not violated and remained acceptable against the procedural criteria. The liner coatings and the moisture barrier were reapplied in these areas and as-left examinations were performed prior to reinstalling the insulation panels and replacing the sheathing.

Based on the fact that inspections performed to date, after 38 years of operation, have indicated no violation of the required minimum liner thickness, and a proposed program that will perform a 100-percent moisture barrier inspection over the course of the second 10-year CISI interval, the licensee concluded that the proposed alternative examinations for the containment moisture barrier continue to provide an acceptable level of quality and safety, while not presenting undue challenge to the moisture barrier insulation.

3.2.6 Staff Evaluation:

In lieu of performing the general visual examinations of 100 percent of the containment moisture barrier during each examination period of the second 10-year CISI interval, as required by the 2001 ASME Code, Table IWE-2500-1, Examination Category E-A, Item E1.30, the licensee proposed alternative examinations in this RR. The proposed alternative provides for removal of approximately one-third of the 62 insulation panels at the base mat interface level, and performance of a general visual examination of the moisture barrier, during each inspection period of the CISI interval. This ensures that a 100-percent general visual examination of the moisture barrier will be performed over the course of the second 10-year CISI interval. In its proposed alternative, the licensee also stated that it will perform opportunistic general visual examinations of the moisture barrier covered by the insulation panels whenever panels at the 228-foot elevation are removed for other maintenance activities.

The NRC staff, by letter dated July 26, 1999, previously authorized a similar RR for the first 10-year CISI interval at HBRSEP. It is stated in this letter that: 1) the specification for the insulation requires that the exposed surface be impervious to water; 2) suitable water seals are provided at points where the insulation ends are exposed to the containment atmosphere; and 3) that sealant is used to prevent water leakage to the containment liner. The detail in Figure 2 of the licensee's January 30, 2009, submittal shows that there is a caulking sealant at the interface between the insulation panel sheathing and the concrete floor at the 228-foot elevation that would also help inhibit water leakage toward the moisture barrier covered by the insulation panel.

Results of the licensee's inspections of 100 percent of the moisture barrier, performed during the first 10-year CISI interval, indicated degradation of the moisture barrier in some locations, which was removed, reapplied, and reexamined. Visual examination of the containment liner after moisture barrier removal revealed that the minimum wall thickness of the liner behind the moisture barrier was not violated and continued to meet the procedural acceptance criteria. Thus, examination of the containment liner behind areas of the insulation with a degraded moisture barrier did not reveal any significant liner degradation during the first CISI interval.

The alternative examinations proposed by the licensee for the second CISI interval cover examination of 100 percent of the moisture barrier over the course of the 10-year interval as was done for the first 10-year CISI interval. The staff also notes that the regulatory modifications in 10 CFR 50.55a(b)(2)(ix)(A), (b)(2)(ix)(B), and (b)(2)(ix)(F) through (b)(2)(ix)(I) that apply to the 2001 ASME Code shall be satisfied, as applicable.

Based on the above, the staff finds that the licensee's proposed alternative examinations during the second 10-year CISI interval for the insulation covered containment moisture barrier, in conjunction with the findings of similar examinations performed during the first 10-year CISI interval, and the applicable regulatory modifications found in 10 CFR 50.55a(b)(2)(ix) for the 2001 ASME Code, would continue to provide an acceptable level of quality and safety. Therefore, the staff concludes that RR IWE/IWL-RR-02 can be authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the second 10-year CISI interval at HBRSEP.

4.0 CONCLUSIONS

Based on the information provided in the January 30, 2009, submittal, the NRC safety evaluation dated July 26, 1999, which previously authorized similar relief, and the staff's evaluation described above, the NRC staff has determined that the proposed alternatives continue to provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), in conjunction with the applicable regulatory modifications to the 2001 ASME Code incorporated by 10 CFR 50.55a(b)(2)(ix), the NRC staff authorizes the CISI program alternatives proposed in RRs IWE/IWL-RR-01 and IWE/IWL-RR-02 for the second 10-year CISI interval at the H.B. Robinson Steam Electric Plant, Unit 2. All other requirements of the ASME Code, Section XI, for which relief has not been specifically authorized, remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

5.0 REFERENCES

1. Letter RNP-RA/08-0018, dated April 04, 2008, from Charles T. Baucom, Progress Energy Carolinas, Inc., to USNRC regarding the H.B. Robinson Steam Electric Plant, Unit 2, Request for Relief from ASME Boiler and Pressure Vessel Code, Section XI, Subsections IWE and IWL Requirements for Containment Inspections (ADAMS Accession No. ML081010435).
2. Letter RNP-RA/09-0004, dated January 30, 2009, from Charles T. Baucom, Progress Energy Carolinas, Inc., to USNRC regarding the H.B. Robinson Steam Electric Plant, Unit 2, Response to Request for Additional Information Related to Request for Relief from ASME Boiler and Pressure Vessel Code, Section XI, Subsections IWE and IWL Requirements for Containment Inspections (ADAMS Accession No. ML090340524).

3. Letter dated September 4, 2008, from Marlayna Vaaler, USNRC, to Thomas D. Walt, Carolina Power & Light Company, related to the H.B. Robinson Steam Electric Plant, Unit 2, Request for Additional Information Regarding Request for Relief from ASME Code, Section XI, Subsections IWE and IWL Requirements for Containment Inspections (TAC No. MD8509) (ADAMS Accession No. ML082210031).
4. Letter dated July 26, 1999, from Herbert Berkow, USNRC, to D.E. Young, Carolina Power & Light Company, related to the Evaluation of Relief Requests IWE/IWL-1 through IWE/IWL-9: Implementation of Subsections IWE and IWL of ASME Section XI for Containment Inspection for Carolina Power and Light Company's H.B. Robinson Steam Electric Plant, Unit 2 (TAC No. MA4637).

Principal Contributor: George Thomas

Date: April 30, 2009

E. McCartney

- 2 -

The NRC staff's safety evaluation is enclosed. If you have any questions regarding this matter, please contact Marlayna Vaaler at (301) 415-3178.

Sincerely,

/RA/

Thomas H. Boyce, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: Safety Evaluation

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