



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
245 PEACHTREE CENTER AVE. NE, SUITE 1200  
ATLANTA, GEORGIA 30303-1257

June 3, 2010

Carolina Power and Light Company  
ATTN: Mr. Eric McCartney  
Vice President - Robinson Plant  
H. B. Robinson Steam Electric Plant, Unit 2  
3851 West Entrance Road  
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT – NRC POST-APPROVAL SITE  
INSPECTION FOR LICENSE RENEWAL INSPECTION REPORT  
05000261/2010010

Dear Mr. McCartney:

On May 7, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed a Post-Approval Site Inspection for License Renewal at your H.B. Robinson Steam Electric Plant, Unit 2. The enclosed report documents the inspection results, which were discussed on May 7, 2010, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

*/RA/*

Mark E. Franke, Chief  
Engineering Branch 3  
Division of Reactor Safety

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

Enclosure: Inspection Report 05000261/2010010  
w/Attachment: Supplemental Information

cc w/encl: see Page 2

cc w/encl:  
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H. B. Robinson Steam Electric Plant

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Hartsville, SC 29550

Letter to Eric McCartney from Mark Franke dated June 3, 2010.

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT – NRC POST-APPROVAL SITE  
INSPECTION FOR LICENSE RENEWAL INSPECTION REPORT  
05000261/2010010

Distribution w/encl:

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**U.S. NUCLEAR REGULATORY COMMISSION**

**REGION II**

Docket No: 50-261

License No: DPR-23

Report No: 05000261/2010010

Licensee: Carolina Power & Light Company

Facility: H.B. Robinson Steam Electric Plant, Unit 2

Location: 3581 West Entrance Road  
Hartsville, SC 29550

Dates: May 3 – 7, 2010

Inspector(s): Joel Rivera-Ortiz, Senior Reactor Inspector

Approved by: Mark Franke, Chief  
Engineering Branch 3  
Division of Reactor Safety

Enclosure

## SUMMARY OF FINDINGS

IR 05000261/2010010; 05/03/2010 – 05/07/2010; H.B. Robinson Steam Electric Plant, Unit 2; Post-Approval Site Inspection for License Renewal.

The report covers an inspection conducted by regional inspectors in accordance with NRC Manual Chapters 2515 and 2516, and NRC Inspection Procedure 71003.

Based on the sample selected for review, the inspectors determined that commitments, license conditions, and regulatory requirements associated with the issuance of the renewed operating license were either being met or, where commitment actions had not been completed, that the licensee had generated tasks in their Action Request system to ensure completion before the period of extended operation.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

None

B. Licensee-Identified Violations

None

## REPORT DETAILS

### 4. OTHER ACTIVITIES

#### 4OA5 Other Activities

##### .1 Post-Approval Site Inspection for License Renewal – IP 71003 (Phase 1)

###### a. Inspection Scope

###### (1) Implementation of License Conditions and Commitments, including Aging Management Programs

The inspectors reviewed a sample of license renewal activities scheduled for the spring 2010 refueling outage (RO-26), which was the last outage before the beginning of the period of extended operation. The inspectors reviewed supporting documents including implementing procedures, work orders, inspection reports, engineering evaluations, and condition reports; conducted interviews with licensee staff; observed in-process outage activities; and performed visual inspection of structures, systems, and components (SSCs) including those not accessible during power operation to verify that the licensee completed the necessary actions to comply with the license conditions stipulated in the renewed facility operating license. The inspectors also verified that the licensee met the commitments associated with the Aging Management Programs (AMPs) described in NUREG-1785, "Safety Evaluation Report (SER) Related to the License Renewal of H.B. Robinson Steam Electric Plant, Unit 2," in accordance with Title 10 of the Code of Federal Regulations (CFR) Part 54, "Requirements for the Renewal of Operating Licenses for Nuclear Power Plants." For a sample of AMPs, the inspectors verified that future activities due prior to the period of extended operation (i.e. July 31<sup>st</sup>, 2010) were implemented as described in NUREG-1785 and the Updated Final Safety Analysis Report (UFSAR) supplement submitted pursuant to 10 CFR 54.21(d). For those license renewal action items that were not completed at the time of this inspection, the inspectors verified that there was reasonable assurance that such action items would be completed prior to the period of extended operation.

The inspection sample is described below for a group of selected commitment items, which are referenced to Appendix A of the SER. Specific documents reviewed are listed in the report attachment.

###### Item 14 – Flow-Accelerated Corrosion Program

Commitment Item 14 specified, in part, that prior to the period of extended operation the Flow-Accelerated Corrosion (FAC) Program will be modified to include additional components potentially susceptible to flow-accelerated corrosion and/or erosion. In its response to request for additional information (RAI) B.3.3-2b, the licensee stated that the components to be added to the program as a result of the aging management review (AMR) were the steam nozzles, feedwater nozzles, SG nozzle thermal sleeves, and temperature elements (thermowells).

The inspectors reviewed a sample of ultrasonic reports for wall thickness measurement on components that were added to the program as a result of the license renewal process to verify that the FAC program was being implemented as stated in the

commitment. Specifically, the inspectors reviewed UT reports for steam generator “B” feedwater inlet nozzle and steam generator “B” steam nozzle.

#### Item 18 – Fire Water System Program

Commitment Item 18 specified that the existing Fire Water System Program will be credited and will be enhanced for license renewal. The Fire Protection Sprinkler Systems will be modified to include the following: (1) for sprinkler heads in service for 50 years either sprinkler head replacement or sampling field service testing of heads in accordance with National Fire Protection requirements and, (2) prior to the period of extended operation, either full flow testing of portions of fire protection wet pipe sprinkler systems through the system cross mains, which are not routinely subject to flow, at the greatest flow and pressure allowed by the design of the systems or alternatively inspections or ultrasonic (UT) testing of a representative sample of these systems. Results from initial tests or inspections, reflecting 40 years of service, will be used to determine the scope and subsequent test/inspection intervals. The intervals are not expected to exceed 10 years.

Commitment Item 18 also specified that prior to the period of extended operation UT inspections will be performed on a representative sampling of the above ground fire protection piping (Fire Protection Suppression Piping) normally containing water. Each sampling will include different sections of piping. Alternatively, internal inspections may be conducted on a representative sampling of these piping systems. Results from initial tests or inspections, reflecting 40 years of service, will be used to determine the scope and subsequent test/inspection intervals. The intervals are not expected to exceed 10 years.

The inspectors directly observed the internal inspection of three piping sections removed from service and interviewed the plant personnel conducting the inspection to verify that the inspection was performed as stated in the commitment. The piping sections belonged to line FP-44B-6, which was originally installed aboveground and supplied the Auxiliary and Containment Vessel Buildings.

At the time of this inspection, this commitment item was partially completed and additional tasks were pending to be implemented prior to the period of extended operation. The inspectors reviewed the administrative controls in place to track those pending actions to verify that there was reasonable assurance that the licensee would complete the necessary actions to meet Commitment Item 18.

#### Item 24 – ASME Section XI, Subsection IWE Program

Commitment Item 24 specified that prior to the period of extended operation the administrative controls for the ASME BPVC, Section XI, Subsection IWE Program will be enhanced to specify the requirements for conducting reexaminations and to document that repairs meet the specified acceptance standards. The existing program conducts periodic visual, surface and volumetric inspections of the steel containment components to detect signs of degradation, assess any damage and correct deficiencies. The program provides for the implementation of ASME Code Section XI, Subsection IWE, in accordance with the provisions of 10 CFR 50.55a. The licensee also identified One-Time Inspection Programs for completing the inspection of inaccessible portions of the

containment liner and the moisture barrier at the interface between the containment inside wall and the concrete floor.

The inspectors conducted a walk-down of the containment building to assess the condition of SSCs within the scope of this program. Particularly, the inspectors directly observed portions of the containment liner and the moisture barrier that are normally covered by insulation panels. The inspectors also reviewed work orders, condition reports, and inspection results; and interviewed licensee personnel with regard to the inspection and material condition of these inaccessible portions of the containment liner and the moisture barrier. The inspectors verified, on a sampling basis, that the program was being implemented in accordance with the license renewal commitment and the applicable Code requirements, including applicable relief requests approved by the NRC.

#### Item 34 – One-Time Inspection Program

Commitment 34 specified that prior to the period of extended operation the One-Time Inspection Program AMP will require one time inspections of selected plant equipment to be performed to verify that current plant AMPs are effective in managing the effects of aging prior to the period of extended operation. The One-Time inspection program provides for examinations of representative materials in environments that are not expected to experience aging effects. The inspectors reviewed a sample of One-Time inspections for the following specific SSCs listed in the SER for this commitment to verify that the program was implemented in accordance with the commitment.

- (a) CCW heat exchanger tubing – The licensee scheduled the installation of new tubes in CCW heat exchanger “A” for RO-26. The inspectors directly observed the licensee staff remove existing CCW heat exchanger tubes. The inspectors also observed the licensee cut and measure wall thickness of selected removed tubes. The licensee performed this inspection to assure that potential degradation due to erosion is managed during the period of extended operation. The inspectors also reviewed preventative maintenance activities that were established to perform eddy current testing for both heat exchangers.
- (b) Steam and Power Conversion Systems – For RO-26, the licensee scheduled inspections of representative locations in miscellaneous piping in steam and power conversion systems protected by the Water Chemistry Program. The inspection locations were selected based on material and environments that would represent leading indicators of aged related degradation. The inspectors reviewed the inspection scope and inspection results for the following components to verify that the program was implemented as stated in the commitment:
  - FW-228, feedwater pump check-valve
  - LCV-1417A, Condensate storage tank to condenser hotwell makeup valve
  - MS-343, steam generator blow down back flow protection check-valve
  - C-53, manual bypass around low pressure heater bypass control valve
  - FWH-6B, inspection of feedwater heater, carbon steel shell

- (c) Small Bore Reactor Coolant System (RCS) piping – The licensee scheduled 20 nondestructive examinations of small bore RCS piping for RO-26 to verify the effectiveness of the water chemistry program. The licensee selected the components based on accessibility, exposure levels, nondestructive examination techniques, and locations identified in NRC Information Notice 97-46, “Unisolable Crack in High-Pressure Injection Piping.” The inspectors reviewed nondestructive examination reports and personnel qualifications for the following locations inspected during RO-26 to verify that the program was implemented as stated in the commitment:
- Welds 122/14, 122/18, 122/19A, 122/21, 122A/28, 122A/32, 122A/41A, and 122/21 in Alternate Charging Line 3-CH-15
  - Welds 124/04, 124/16A, and 124/17 in Charging Line 3-CH-15A
- (d) Inaccessible Areas of Containment Liner Plate and Moisture Barrier – The inspectors directly observed and interviewed licensee personnel about the material condition of sections of the containment liner plate and moisture barrier that were previously inspected to meet this commitment and were accessible during RO-26 for inspection under the Section XI IWE Program.

At the time of this inspection, this commitment item was partially completed and additional tasks were pending to be implemented prior to the period of extended operation. The inspectors reviewed the administrative controls in place to track those pending actions to verify that there was reasonable assurance that the licensee would complete the necessary actions to meet Commitment Item 34.

#### Item 35 – Selective Leaching of Materials Program

Commitment Item 35 specified that prior to the period of extended operation the Selective Leaching of Materials Program will be a new program to determine the properties of selected components that may be susceptible to selective leaching. The program will ascertain whether loss of material is occurring and whether the process will affect the ability of the components to perform their intended function for the period of extended operation.

The inspectors observed the licensee perform an inspection of the interior of a fire water valve (FP-86) and interviewed the licensee staff that performed the inspection with regard the selection of components for inspection and the acceptance criteria used, in order to verify that the program was implemented as stated in the commitment.

At the time of this inspection, this commitment item was partially completed and additional tasks were pending to be implemented prior to the period of extended operation. The inspectors reviewed the administrative controls in place to track those pending actions to verify that there was reasonable assurance that the licensee would complete the necessary actions to meet Commitment Item 35.

#### Item 38 – Aging Management Program for Neutron Flux Instrumentation Circuits

Commitment Item 38 specified that prior to the period of extended operation the AMP for Neutron Flux Instrumentation Circuits will be a new program that will employ insulation resistance or other testing to identify the potential existence of aging degradation of

cables in neutron monitoring circuits at least once every 10 years. This program applies to the cables used for the Source Range, Intermediate Range, Power Range, and Gamma-Metrics circuits of the Excore Nuclear Instrumentation System. In this aging management program, an appropriate test, such as insulation resistance tests, time domain reflectometry tests, or I/V (current/voltage) testing will be used to identify the potential existence of a reduction in cable insulation resistance.

The inspectors reviewed work orders and condition monitoring results completed in RO-26 for the following Neutron Flux Instrumentation Circuits to verify that the program was implemented as stated in the commitment:

- N-31, Source Range
- N-32, Source Range
- N-35, Intermediate Range
- N-36, Intermediate Range
- N-41, Power Range
- N-42, Power Range
- N-43, Power Range
- N-44, Power Range
- N-51, Post Accident Monitoring
- N-52, Post Accident Monitoring

#### Item 40 – Aging Management Program for Bus Duct

Commitment Item 40 specified that prior to the period of extended operation the AMP for Bus Ducts will be a new program that focuses on periodically inspecting the iso-phase bus duct, as well as all non-segregated 4.16 kilo-volts (KV) and 480V bus ducts at least once every 10 years. The program will check a sampling of bolted connections of bus ducts. The sample of accessible bolted connections will be checked for loose connections by using thermography or by measuring connection resistance using a low-range ohmmeter. Visual inspections of the bus ducts for signs of cracks, corrosion, foreign debris, excessive dust buildup, evidence of water intrusion or discoloration, which may indicate overheating, will also be performed to identify the potential existence of aging degradation.

The inspectors reviewed work orders and inspection results for the following bus duct inspections conducted during RO-26 to verify that the program was implemented as stated in the commitment.

- 2A-to-2B (Bus duct from 480V 2B Bus to 2A Main Bus)
- BD-Bus 2A-SST-2B (Bus duct from 480V Bus 2A to SST 2B)

At the time of this inspection, this commitment item was partially completed and additional tasks were pending to be implemented prior to the period of extended operation. The inspectors reviewed the administrative controls in place to track those pending actions to verify that there was reasonable assurance that the licensee would complete the necessary actions to meet Commitment Item 40.

(2) License Renewal Commitment Changes

The review of license renewal commitment changes was completed by regional inspectors during the Phase 2 implementation of inspection procedure 71003, which was documented in NRC inspection report 05000261/2010008.

(3) Newly Identified SSCs

The review of newly identifies SSCs was completed by regional inspectors during the Phase 2 implementation of inspection procedure 71003, which was documented in NRC inspection report 05000261/2010008.

(4) Description of AMPs and Time Limited Aging Analyses (TLAAs) in the UFSAR Supplement

The review of the description of AMPs and TLAAs in the UFSAR supplement submitted pursuant 10 CFR 54.21(d) was completed by regional inspectors during the Phase 2 implementation of inspection procedure 71003, which was documented in NRC inspection report 05000261/2010008.

b. Findings and Observations

This inspection resulted in no findings of significance.

c. Overall Conclusions

On the basis of the sample selected for review, the inspectors determined that the license renewal commitments, including the AMPs, were implemented as described in the LRA and the SER. The inspectors determined that the licensee had completed, or was on track to complete, the necessary tasks to meet the license renewal commitments, license conditions, and regulatory requirements associated with the issuance of the renewed operating license at the H.B. Robinson Steam Electric Plant Unit 2. Some commitments still had pending actions, for which tracking items existed in the Action Request system to ensure their completion. Based on the review of completed actions to meet license renewal commitments and the administrative controls in place to track pending license renewal actions, the inspectors determined that there was reasonable assurance that the licensee would complete the remaining actions to meet the license renewal commitments prior to the period of extended operation.

4OA6 Management MeetingsExit Meeting Summary

On May 7<sup>th</sup>, 2010, the inspectors presented the inspection results to Mr. Eric McCartney and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

**SUPPLEMENTAL INFORMATION**

**KEY POINTS OF CONTACT**

Licensee

T. Bardauskas, Site License Renewal Manager  
M. Heath, Corporate License Renewal Manager  
G. Sanders, Licensing Engineer

**LIST OF ITEMS OPENED, CLOSED AND DISCUSSED**

Opened

None

Closed

None

Discussed

None

## LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance or endorsement of the document or any part of it.

### Work Orders

WO 1152110-01, Remove 480V Bus Duct Panels and Perform Inspection  
 WO 1429456-01, Condition Monitoring Data for N-36  
 WO 1429457-01, Condition Monitoring Data for N-35  
 WO 1485660-01, Condition Monitoring Data for N-41  
 WO 1485661-01, Condition Monitoring Data for N-42  
 WO 1485662-01, Condition Monitoring Data for N-43  
 WO 1485663-01, Condition Monitoring Data for N-44  
 WO 1485680-01, Condition Monitoring Data for N-32  
 WO 1485684-01, Condition Monitoring Data for N-31  
 WO 1485685-01, Condition Monitoring Data for N-52  
 WO 1485686-01, Condition Monitoring Data for N-51  
 WO 1496235-01, Remove 480V Bus Duct Panels and Perform Inspection  
 WO 1530120-01, RO-26 Remove Insulation to Support the IWE-IWL Program  
 WO 1531181-01, Inspect FP Piping FP44B-6  
 WO 1531181-05, Inspect FP Piping (License Renewal)  
 WO 1531600, RO-26 Provide Support as Necessary to Support the IWE-IWL Program  
 WO 1537084-01, CS-53/Piping License Renewal Inspection  
 WO 1537086-01, LCV-1417A/Piping License Renewal Inspection  
 WO 1537088-01, FWH-6B/Piping License Renewal Inspection  
 WO 1537089-01, FW-228 License Renewal Inspection  
 WO 1537102-01, Inspect MS-343 for License Renewal Commitment

### Action Requests/Nuclear Condition Reports

NCR 00300581-28  
 NCR 00365676  
 NCR 00380367, FSAR Chapter 18 Update for Vessel Head Inspections  
 NCR 00380376, MMM-016 Clarification to Define "High Strength" Bolting  
 NCR 00380471, Tracking of Open License Renewal Commitments  
 NCR 00380649, License Renewal Commitments for FAC Program  
 NCR 00380767, Discrepancy in OP-909 Concerning LR Commitment for AFOST  
 NCR 00381173, PLP-037 Requirements for NIS Maintenance  
 NCR 00381872, Difference in Words between LR Commitment and Procedures  
 NCR 00382852, License Renewal Commitment Not Fully Described in the UFSAR  
 NCR 00382858, Part of License Renewal Commitment Lost in Procedure Revision  
 NCR 00394244, Bulge Discovered on CV Liner  
 NCR 00397425, CV Liner Degradation Exceeding Screening Criteria in CM-764  
 NRC 00380373, Letter RNP-RA/09-0067 was Identified with a Discrepancy

### Procedures

CM-764, Inspection and Repair of CV Liner and Insulation, Revision 9

Other Documents

AR 00084931, Commitment in RNP-RA/03-0031 Flow-Accelerated Corrosion Program

AR 00084942-1, LR Commitment #18

AR 00084960-01, LR Commitment Item 24, ASME Section XI, Subsection IWE

AR 00085018, LR Commitment Item 35

AR 92139-02, Aging Management Program for Neutron Flux Instrumentation

AR00085012, LR Commitment Item 34

AR00092147-01, LR Commitment Item 40

Engineering Change 72699R0

H.B. Robinson Steam Electric Plant Unit 2 – Updated Final Safety Analysis Report, Revision 19, Chapter 18, “Aging Management Programs and Activities”

H.B. Robinson Steam Electric Plant Unit 2 – Updated Final Safety Analysis Report, Revision 20, Chapter 18, “Aging Management Programs and Activities”

H.B. Robinson Steam Electric Plant Unit 2 – Updated Final Safety Analysis Report, Revision 21, Chapter 18, “Aging Management Programs and Activities”

H.B. Robinson Steam Electric Plant Unit 2 – Updated Final Safety Analysis Report, Revision 22, Chapter 18, “Aging Management Programs and Activities”

NDE Report No. 2010-01612, dated 5/5/10

NDE Reports UT-10-022, UT-10-024, UT-10-026, UT-10-028, UT-10-030, UT-10-032, PT-10-032, UT-10-034, PT-10-034, UT-10-037, UT-10-039, UT-10-041

NUREG-1785, “Safety Evaluation Report (SER) Related to the License Renewal of H.B. Robinson Steam Electric Plant, Unit 2”

UT Report on component ID FW10-48 exp, dated 4/25/10

**LIST OF ACRONYMS USED**

ADAMS	Agencywide Document Access Management System
AFW	Auxiliary Feedwater
AMP	Aging Management Program
AR	Action Request
ASME	American Society of Mechanical Engineers
BPVC	Boiler and Pressure Vessel Code
CCW	Component Cooling Water
CFR	Code of Federal Regulations
EC	Engineering Change
FAC	Flow-Accelerated Corrosion
GALL	NUREG-1801 "Generic Aging Lessons Learned"
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
ISI	Inservice Inspection
LRA	License Renewal Application
NCR	Nuclear Condition Report
NDE	Non-Destructive Examination
NRC	U.S. Nuclear Regulatory Commission
PARS	Publicly Available Records
RAI	Request for Additional Information
RCS	Reactor Coolant System
RNP	Robinson Nuclear Plant
RO	Refueling Outage
SER	Safety Evaluation Report
SG	Steam Generator
SSC	Structures, Systems, and Component
TLAA	Time Limited Aging Analysis
UFSAR	Updated Final Safety Analysis Report
UT	Ultrasonic Testing
WO	Work Order