



Serial: RNP-RA/10-0059

JUN 14 2010

United States Nuclear Regulatory Commission
 ATTN: Document Control Desk
 11555 Rockville Pike
 Rockville, Maryland 20852

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

SUPPLEMENT TO REQUEST FOR RELIEF FROM ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI, FOR THE FOURTH TEN-YEAR INSERVICE INSPECTION PROGRAM INTERVAL (RELIEF REQUEST NO. RR-22)

Ladies and Gentlemen:

Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), has previously submitted a request for relief, on the basis that ASME, Section XI, Appendix VIII, contains no supplement for demonstrating Bottom-Mounted Instrument (BMI) penetrations Ultrasonic Testing (UT) procedures. That relief request was provided to the NRC for review in a letter dated June 7, 2010. That relief request was submitted pursuant to 10 CFR 50.55a(a)(3)(i), as an alternative method that provides an acceptable level of quality and safety.

The relief request proposed the alternative method of performing automated UT of the BMIs from the inside surface using procedures and equipment that have been demonstrated as described in MRP-166, "Materials Reliability Program: Demonstration of Equipment and Procedures for the Inspection of Alloy 600 Bottom Mounted Instrumentation (BMI) Head Penetrations," as supplemented by a demonstration described in AREVA document 51-9137268-000. The basis for the relief request stated that the proposed qualification technique would provide an acceptable level of quality and safety and allow completion of the UT examinations in lieu of the visual examination requirements as provided by Code Case N-722, Table 2, Footnote 5, which states, "An ultrasonic examination (UT), performed from the component inside or outside surface in accordance with the requirements of Table IWB-2500-1 and Appendix VIII (1995 Edition with the 1996 Addenda or later) shall be acceptable in lieu of the visual, VE requirement of this table."

The regulatory basis for this relief request has been further considered. It is now concluded that the regulatory basis can be considered 10 CFR 50.55a(a)(3)(ii), which states, "compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety."

Progress Energy Carolinas, Inc.
 Robinson Nuclear Plant
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 NRC

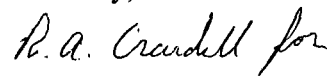
Specifically, ASME, Section XI, Appendix VIII, contains no supplement for demonstrating BMI penetration UT procedures. The lack of an ASME Code examination qualification method for the BMI penetration configuration results in the inability to perform qualification in accordance with the ASME Code. This lack of code guidance poses a hardship and unusual difficulty for performing the qualification of the examination method and has necessitated the relief request as proposed by letter dated June 7, 2010.

In recognition of this difficulty, Progress Energy has contacted the EPRI NDE Center to request consideration of a Performance Demonstration Initiative similar to that done for upper head penetrations described in Code Case N-729-1. It is recognized that applicable code requirements will not be available for examinations conducted at HBRSEP, Unit No. 2, during the current refueling outage (Refueling Outage 26). It is intended that this request could result in reducing the likelihood that this form of relief would be needed during future examinations.

As stated in the June 7, 2010 letter, PEC requests approval of this request by June 18, 2010, in order to support the aspects of the Fourth Ten-Year Inservice Inspection for HBRSEP, Unit No. 2, being performed during Refueling Outage No. 26.

If you have any questions concerning this matter, please contact me at (843) 857-1626.

Sincerely,



Curt Castell

Supervisor – Licensing/Regulatory Programs

CAC/rac

c: L. A. Reyes, NRC, Region II
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