

Serial: RNP-RA/10-0073

JUL 2 6 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), previously submitted a request for relief in a letter dated June 7, 2010, as supplemented by a letter dated June 14, 2010. The June 7, 2010 letter transmitted the AREVA Report "51-9137268-000, Capability Study for BMN Ultrasonic Examination Procedure 54-ISI-167-03." The letter also included an affidavit letter from AREVA documenting the proprietary nature of the report.

It has been noted that the title of the report specified in the AREVA affidavit letter did not match the title of the transmitted report. Therefore, this letter is transmitting a revised AREVA affidavit letter, which corrects the report title and supersedes the affidavit letter from the June 7, 2010 letter.

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

Sincerely,

Curt Caster

Curt Castell Supervisor – Licensing/Regulatory Programs

Attachment

RAC/rac

c: L. A. Reyes, NRC, Region II T. J. Orf, NRC, NRR NRC Resident Inspector

> Progress Energy Carolinas, Inc. Robinson Nuclear Plant 3581 West Entrance Road Hartsville, SC 29550

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## AFFIDAVIT

## COMMONWEALTH OF VIRGINIA ) ) CITY OF LYNCHBURG )

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

SS.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in document number 51-9137268-000 entitled, "Capability Study for BMN Ultrasonic Examination Procedure 54-ISI-167-03," dated May 2010 and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process,
  methodology, or component, the exclusive use of which provides a
  competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(e) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

SUBSCRIBED before me this \_ 2010. day of

end

Kathleen Ann Bennett NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA MY COMMISSION EXPIRES: 8/31/11 Reg. # 110864

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