



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,

A handwritten signature in cursive script that reads "Curt Castell".

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

A047  
NRR



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.

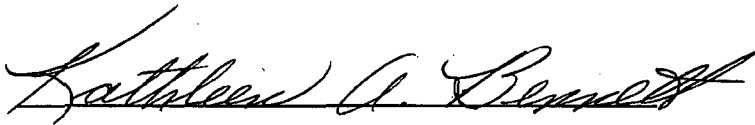
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited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

A handwritten signature in black ink, appearing to be 'A. P. A.', written over a horizontal line.

SUBSCRIBED before me this 13<sup>th</sup>  
day of July, 2010.

A handwritten signature in black ink, reading 'Kathleen A. Bennett', written over a horizontal line.

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

