



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

June 3, 2011

Mr. Robert J. Duncan II, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant, Unit 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2 – REQUEST TO
INCORPORATE LATER EDITIONS AND ADDENDA OF THE ASME BOILER
AND PRESSURE VESSEL CODE, SECTION XI, INTO THE FOURTH 10-YEAR
INSERVICE INSPECTION PROGRAM INTERVAL (TAC NO. ME6319)

Dear Mr. Duncan:

By letter dated May 27, 2011, Carolina Power & Light Company (the licensee), requested Nuclear Regulatory Commission (NRC) review and approval of the following change to the fourth 10-year interval of the H. B. Robinson Steam Electric Plant (HBRSEP), Unit 2 Inservice Inspection (ISI) Program.

The licensee stated that the current fourth 10-year ISI Program at HBRSEP Unit 2 is based on the 1995 Edition with 1996 Addenda of the American Society of Mechanical Engineers (ASME) Code. The HBRSEP ISI Program identifies and uses ASME Code Case N-523-2, "Mechanical Clamping Devices for Class 2 and 3 Piping, Section XI, Division 1," which was approved for use in Regulatory Guide (RG) 1.147, Revision 14. Subsequently, ASME annulled the code case, as documented in RG 1.147, Revision 15, because the code case was incorporated as Appendix IX, "Mechanical Clamping Devices for Class 2 and 3 Piping Pressure Boundary," into the 1997 Addenda of the ASME Code, Section XI. The licensee requested NRC approval to incorporate Appendix IX of the 1997 Addenda of ASME Code, Section XI into the current HBRSEP ISI Program, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(4)(iv).

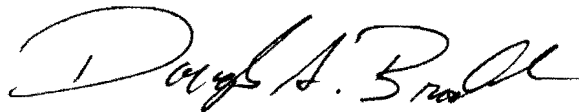
The licensee requested the subject change in accordance with the provisions of NRC Regulatory Issue Summary (RIS) 2004-16, "Use of Later Editions and Addenda to the ASME Code, Section XI for Repair/Replacement Activities." RIS 2004-16 states that licensees who wish to use provisions of later editions and addenda of the ASME Code, Section XI rather than the edition and addenda specified in the code of record for repair/replacement activities must receive prior NRC review and approval as required by 10 CFR 50.55a(g)(4)(iv). Paragraph 50.55a(g)(4)(iv) states that inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section (i.e., 10 CFR 50.55a), subject to the limitations and modifications listed in paragraph (b) of this section and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met. The latest edition of the ASME Code that is incorporated by reference in 10 CFR 50.55a(b) is the 2004 edition. The 1997 Addenda has been incorporated into the 1998 Edition through the 2004 edition of the ASME Code and is acceptable for use pursuant to 10 CFR 50.55a.

The NRC staff has reviewed the subject request and concludes that the licensee has adequately addressed all of the regulatory requirements of 10 CFR 50.55a(g)(4)(iv). The NRC staff notes that 10 CFR 50.55a(b) does not impose conditions or limitations on Appendix IX of the ASME Code, Section XI, 1997 Addenda. Additionally, the NRC staff has not identified any additional related requirements in the 1997 Addenda of the ASME Code that need to be met in order to implement Appendix IX. Therefore, the NRC staff finds the request by Carolina Power & Light Company acceptable, and approves the use of Appendix IX of the ASME Code, Section XI, 1997 Addenda for the remainder of the fourth 10-year ISI Program, which is currently scheduled to end on February 18, 2012, at HBRSEP, Unit 2.

All other ASME Code, Section XI requirements for which approval was not specifically requested in the licensee's letter dated May 27, 2011, remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions regarding this matter, please contact Brenda Mozafari at (301) 415-2020.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas A. Broaddus". The signature is fluid and cursive, with a large initial "D" and "B".

Douglas A. Broaddus, Branch Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-261

cc: Distribution via Listserv

R. Duncan

- 2 -

The NRC staff has reviewed the subject request and concludes that the licensee has adequately addressed all of the regulatory requirements of 10 CFR 50.55a(g)(4)(iv). The NRC staff notes that 10 CFR 50.55a(b) does not impose conditions or limitations on Appendix IX of the ASME Code, Section XI, 1997 Addenda. Additionally, the NRC staff has not identified any additional related requirements in the 1997 Addenda of the ASME Code that need to be met in order to implement Appendix IX. Therefore, the NRC staff finds the request by Carolina Power & Light Company acceptable, and approves the use of Appendix IX of the ASME Code, Section XI, 1997 Addenda for the remainder of the fourth 10-year ISI Program, which is currently scheduled to end on February 18, 2012, at HBRSEP, Unit 2.

All other ASME Code, Section XI requirements for which approval was not specifically requested in the licensee's letter dated May 27, 2011, remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions regarding this matter, please contact Brenda Mozafari at (301) 415-2020.

Sincerely,

/RA/

Douglas A. Broaddus, Branch Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-261

cc: Distribution via Listserv

DISTRIBUTION:

PUBLIC

Lpl2-2 r/f

RidsNrrPMRobinson Resource

SBush-Goddard, EDO

RidsNrrDorlLpl2-2 Resource

RidsNrrLACSola Resource

RidsRgn2MailCenter

JTsao, NRR

RidsOgcRp Resource

RidsAcrcAcnw_MailCTR Resource

RidsNrrDciCpnb Resource

ADAMS Accession No. ML11151A202

OFFICE	NRR/LPL2-2/PM	NRR/LPL2-2/LA	NRR/DCI/CPNB	NRR/LPL2-2/BC
NAME	BMozafari	CSola	TLupold	DBroaddus
DATE	06/03/11	06/03/11	06/02/11	06/03/11

OFFICIAL COPY RECORD