



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

August 21, 2012

Mr. William R. Gideon, 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 NO. 2 – REQUEST FOR  
ADDITIONAL INFORMATION RELATED TO RELIEF REQUEST-2 FOR THE  
FIFTH 10-YEAR INTERVAL INSERVICE TESTING PROGRAM PLAN  
(TAC NO. ME8259)

Dear Mr. Gideon:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated March 16, 2012 (Agencywide Documents Access and Management System Accession (ADAMS) No. ML12086A067), Carolina Power & Light Company (the licensee), doing business as Progress Energy Carolinas, Inc., submitted Relief Requests (RR)-1, RR-2, and RR-3 for the Inservice Testing (IST) Program Plan for the Fifth 10-Year Interval for the H. B. Robinson Steam Electric Plant, Unit No. 2.

By letter dated May 10, 2012 (ADAMS Accession No. ML12138A041), the licensee submitted its response to the NRC's staff request for additional information (RAI), which was sent on May 4, 2012. Subsequently, by letter dated June 4, 2012 (ADAMS Accession No. ML12165A261), the licensee submitted its response to RAI-2, which was sent on May 24, 2012. The NRC staff is reviewing your responses to RAI-2 and has determined that additional information is required to complete its review of IST RR-2. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on July 20, 2012, it was agreed that you would provide a response within 30 days of the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources.

Please contact me at (301) 415-3302 if you have any questions.

Sincerely,

*Araceli T. Billoch Colón*

Araceli Billoch Colón, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261  
Enclosure: RAI  
cc w/encl: Distribution via ListServ

REQUEST FOR ADDITIONAL INFORMATION

REGARDING H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

INSERVICE TESTING PROGRAM PLAN FOR THE FIFTH 10-YEAR INTERVAL

DOCKET NO. 50-261

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated March 16, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML110310012), Carolina Power & Light Company, doing business as Progress Energy Carolinas, Inc., submitted Relief Requests (RR)-1, RR-2, and RR-3 for the Inservice Testing Program (IST) Plan for the Fifth 10-Year Interval for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP).

By letter dated May 10, 2012 (ADAMS Accession No. ML12138A041), the licensee submitted its response to the NRC's staff request for additional information (RAI), which was sent on May 4, 2012. Subsequently, by letter dated June 4, 2012 (ADAMS Accession No. ML12165A261), the licensee submitted its response to RAI-2, which was sent on May 24, 2012. The NRC staff is reviewing your responses to RAI-2 and has determined that additional information is required to complete its review of IST RR-2.

**IST-RR-2: "Required Instrumentation Accuracy"**

In the basis for requesting relief, the licensee stated:

*Generally, spare instruments are maintained and certified, but may not be available, or rendered inoperable. When calibrated instruments are not available, back-up instruments can be installed and verified in accordance with a detailed procedure in order to provide a high level of assurance relative to the proper operation of the flow rate device.*

- 1) Explain why the back-up flow measurement instruments are not calibrated.
- 2) Clarify if the back-up instruments are property of the plant and where the instruments are stored when not in use.
- 3) Explain if the procedure that addresses the installation and verification of the back-up instruments addresses calibration procedures.
- 4) Clarify if there is a plant procedure that addresses instrument calibration and if the back-up instruments are included in that procedure.
- 5) State how many of these noncalibrated flow measurement instruments the plant has installed.

Enclosure

In letter dated May 10, 2012 (ML12138A041), the licensee submitted the following response to RAI-3:

*The ultrasonic flow meters are dependent of pipe size, wall thickness and spacing parameters. HBRSEP has used non-calibrated meters in the past and found the degree of error to be within the normally expected test variations. Vendor literature indicates that an intrinsic accuracy of 3% of flow rate can be expected when set up properly. The degree of error is based on percent of reading; which provides a higher accuracy than percent of scale where the actual allowable error is 6% of reading. However, the vendor rating is not replicated on a certificate of compliance. HBRSEP documents the proper installation and set up of these meters prior to use. This relief was utilized during the fourth program interval and a table showing the results of use during the previous interval, is included below. The table may not be inclusive of each instance that this provision was utilized due to the large volume of tests; however, is intended to reflect the known instances and is indicative of expected instrument performance.*

<b>Pump (PMP)</b>	<b>Non-Calibrated Flow Rate</b>	<b>Calibrated Flow Rate</b>	<b>Deviation</b>
[Service Water] SW -PMP-A	7327 [gallons per minute] gpm on 10/22/09	7316 gpm on 1/14/10	0.15% of actual
SW -PMP-B	7062 gpm on 11/17/09	6910 gpm on 1/14/10 7024 gpm on 2/19/10	2.2% of actual 0.54% of actual
[Safety Injection] SI-PMP-C	1186.59 psid @ set flow of 322 gpm on 1/7/09  1186.8 psid @ set flow of 325.1 gpm on 3/23/10	1176.79 psid @ set flow of 323 gpm on 8/18/10	0.87% of actual

SW-PMP-A & SW-PMP-B utilize a common flow rate device. The SI-PMP-C test involved the biennial comprehensive pump test. A subsequent test was completed approximately 5 months later, instead of 2 years.

The data contained in the table provided is very limited and the dates of measurement are too far apart. In the case of SW-PMP-A, the time between the calibrated and the noncalibrated flow rate tests is of about 3 months.

- 1) Clarify if there is a larger data sample that compares the measurements of calibrated and noncalibrated instruments within a shorter time frame.

August 21, 2012

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**SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – REQUEST FOR ADDITIONAL INFORMATION RELATED TO RELIEF REQUEST-2 FOR THE FIFTH 10-YEAR INTERVAL INSERVICE TESTING PROGRAM PLAN (TAC NO. ME8259)**

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Sincerely,  
**/RA/**  
Araceli Billoch Colón, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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\*Memo Dated

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