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Serial: RNP-RA/13-0089

10 CFR 50.90

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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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

**SUPPLEMENTAL SUBMITTAL TO CORRECT TS PAGES REGARDING REQUEST FOR
REVISION TO STEAM GENERATOR PROGRAM INSPECTION FREQUENCIES AND TUBE
SAMPLE SELECTION AND APPLICATION OF PERMANENT ALTERNATE REPAIR CRITERIA**

By letter dated August 29, 2012, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12251A363), pursuant to 10 CFR 50.90, Carolina Power and Light Company requested an amendment to the H. B. Robinson Steam Electric Plant, Unit No. 2 renewed facility operating license DPR-23, Appendix A, Technical Specifications (TS) Sections 5.5.9, Steam Generator (SG) Program.

By letter dated February 4, 2013, (ADAMS Accession No. ML13017A288) the NRC staff requested additional information (RAI) needed to continue its review of the proposed license amendment.

By letter dated April 9, 2013 (ADAMS Accession No. ML13123A221) Duke Energy Progress, Inc. formerly known as Carolina Power and Light Company provided its response to the NRC's request for additional information.

Attached please find replacement TS pages (pages 5.0-13 and 5.0-28) for the corresponding TS pages in Attachment 2 to the April 9, 2013 letter. The replacement of these pages does not affect the conclusions of either the 10 CFR 50.92 No Significant Hazards Consideration Determination or the Environmental Considerations included in the Enclosure to the April 9, 2013 submittal letter. There are no other changes or additions to the Attachments to April 9, 2013 letter which presented the proposed TS page markups, the retyped TS pages, and marked up TS Bases pages (for information only).

This document contains no new Regulatory Commitments.

In accordance with 10 CFR 50.91(b), a copy of this application is being provided to the State of South Carolina. If you have any questions regarding this submittal, please contact Mr. Richard Hightower, Supervisor - Licensing/Regulatory Programs at (843) 857-1329.

A001
MRR

I declare under penalty of perjury that the foregoing is true and correct. Executed On: 08/22/13

Sincerely,



Sharon Wheeler-Peavyhouse
Manager – Support Services – Nuclear

SWP/sc

Attachment: Replacement Pages for TS Pages 5.0-13 and 5.0-28 of Attachment 2 of RNP-RA/13-0030.

cc: Ms. S. E. Jenkins, Manager, Infectious and Radioactive Waste Management Section (SC)
Mr. V. M. McCree, NRC Region II
Mr. S. P. Lingam, NRC Project Manager, NRR NRC
Resident Inspectors, HBRSEP
Mr. A. Wilson, Attorney General (SC)

United States Nuclear Regulatory Commission
Attachment to Serial: RNP-RA/13-0089
3 Pages, including this cover page

ATTACHMENT

Replacement Pages for TS Pages 5.0-13 and 5.0-28

of Attachment 2 of RNP-RA/13-0030

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program
(continued)

- c. Provisions for SG tube plugging criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding the following criteria shall be plugged: 47% of the nominal tube wall thickness if the next inspection interval of that tube is ≤ 12 months, and a 2% reduction in the plugging criteria for each 12 month period until the next inspection of the tube.

The following alternate tube plugging criteria shall be applied as an alternative to the preceding criteria:

Tubes with service-induced flaws located greater than 18.11 inches below the top of the tubesheet do not require plugging. Tubes with service-induced flaws located in the portion of the tube from the top of the tubesheet to 18.11 inches below the top of the tubesheet shall be plugged upon detection.

- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. A degradation assessment shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
2. After the first refueling outage following SG installation, inspect each SG at least every 48 effective full power months or at least every other refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, and c below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy

(continued)

5.6 Reporting Requirements (continued)

5.6.7 Tendon Surveillance Report

- a. Notification of a pending sample tendon test, along with detailed acceptance criteria, shall be submitted to the NRC at least two months prior to the actual test.
- b. A report containing the sample tendon test evaluation shall be submitted to the NRC within six months of conducting the test.

5.6.8 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, Steam Generator (SG) Program. The report shall include:

- a. The scope of inspections performed on each SG.
- b. Degradation mechanisms found.
- c. Nondestructive examination techniques utilized for each degradation mechanism.
- d. Location, orientation (if linear), and measured sizes (if available) of service induced indications.
- e. Number of tubes plugged during the inspection outage for each degradation mechanism.
- f. The number and percentage of tubes plugged to date, and the effective plugging percentage in each steam generator.
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing.
- h. The primary to secondary leakage rate observed in each SG (if it is not practical to assign the leakage to an individual SG, the entire primary to secondary leakage should be conservatively assumed to be from one SG) during the cycle preceding the inspection that is the subject of the report.
- i. The calculated accident induced leakage rate from the portion of the tubes below 18.11 inches from the top of the tubesheet for the most limiting accident in the most limiting SG. In addition, if the calculated accident induced leakage rate from the most limiting accident is less than 1.87 times the maximum operational primary to secondary leakage rate, the report should describe how it was determined, and