DUKE ENERGY®

W. R. Gideon
H. B. Robinson Steam Electric Plant Unit 2
Site Vice President

Duke Energy Progress
3581 West Entrance Road
Hartsville, SC 29550

O: 843 857 1701
F: 843 857 1319

Randy.Gideon@duke-energy.com

10 CFR 50.4

Serial: RNP-RA/14-0009

FEB 2 4 2014

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

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

Subject: Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order No. EA-12-051)

References:

1. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,* dated March 12, 2012, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679)
2. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Revision 0, dated August 29, 2012, (ADAMS Accession No. ML12221A339)
3. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation",* Revision 1, dated August 2012, (ADAMS Accession No. ML12240A307)
4. Duke Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 29, 2012, (ADAMS Accession No. ML12307A020)
5. Duke Energy Letter, *Carolina Power & Light Company's Overall Integrated Plans in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051),* dated February 28, 2013, (ADAMS Accession No. ML13086A096)
6. Duke Energy Letter, *Carolina Power & Light Company, First Six-month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051),* Dated August 26, 2013, (ADAMS Accession No. ML13242A010)
7. NRC Letter, *H. B. Robinson Steam Electric Plant, Unit 2 –Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC NO. MF0793),* Dated November 19, 2013, (ADAMS Accession No. ML13273A481)

A001
NRR

Ladies and Gentlemen,

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (i.e., Reference 1) to Duke Energy Progress. Reference 1 was immediately effective and directs Duke Energy Progress to have a reliable indication of water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Duke Energy Progress initial status report regarding spent fuel pool instrumentation. Reference 5 provided the Duke Energy Progress Overall Integrated Plan (OIP).

Reference 1 required submission of a status report at six-month intervals following submittal of the OIP. Reference 3 provides direction regarding the content of the status reports. Reference 6 provided the first six-month status report for the H. B. Robinson Steam Electric Plant, Unit No. 2. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

By Letter dated November 19, 2013 (Reference 7), the NRC staff provided an Interim Staff Evaluation (ISE) which included a Request for Additional Information (RAI) to H. B. Robinson Steam Electric Plant, Unit No. 2. In accordance with Reference 7, NRC staff requested that a response to the RAI be provided in the next six-month update, with all information be provided by September 30, 2014. H. B. Robinson Steam Electric Plant, Unit No. 2 does not currently have sufficient information to provide a complete response to the RAI, so we are currently planning to provide our response in the next six month update.

This letter contains no new Regulatory Commitments and no revision to existing Commitments.

Should you have any questions regarding this submittal, please contact Mr. Richard Hightower, Manager, Nuclear Regulatory Affairs at (843) 857-1329.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2/24/14.

Sincerely,

W. R. Gideon
Site Vice President

WRG/shc

Enclosure: Second Six-Month Status Report in Response to Order EA-12-051

cc: Mr. K. M. Ellis, NRC Senior Resident Inspector
Mr. S. P. Lingam, NRC Project Manager, NRR
Mr. V. M. McCree, NRC Region II Administrator

U. S. Nuclear Regulatory Commission
Enclosure to Serial: RNP-RA/14-0009
3 Pages (including cover page)

ENCLOSURE

H. B. Robinson Steam Electric Plant, Unit No. 2

Docket No. 50-261

Renewed License No. DPR-23

Second Six-Month Status Report in Response to Order EA-12-051

1 Introduction

H. B. Robinson Steam Electric Plant, Unit No. 2 developed an Overall Integrated Plan (OIP) (Reference 1 in Section 8), documenting the requirements to install reliable spent fuel pool level instrumentation in response to NRC Order EA-12-051. The first six-month update was provided to the NRC on August 26, 2013 (Reference 2 in Section 8). This enclosure provides an update since submittal of the first six-month update that occurred during the period from July 31, 2013 to January 31, 2014 (hereafter referred to as "the update period").

In response to NEI 12-02, Spent Fuel Pool Level Instrumentation (SFPLI) for NTTF 7.1 has been developed to provide a means for monitoring level in the spent fuel pool at Robinson Nuclear Plant (HBR-2). New instrumentation, using guided wave technology will be installed in the fuel handling building with level displayed in the Main Control Room and locally in the fuel handling building. Two channels will be installed to ensure survivability after the occurrence of a Beyond-Design-Basis External Event (BDBEE). This system uses through-air radar furnished by AREVA and manufactured by VEGA Americas, Inc. This device is a non-contact device which does not contact the water in the pool.

The level measurement is to cover a wide range within the SFP, providing continuous indication over the entire span with 3 critical levels defined as:

- Level 1: Adequate to support normal operations
- Level 2: Adequate to provide substantial radiation shielding for a person measuring SFP level locally
- Level 3: Level is such where the fuel is covered and actions should no longer be deferred to implement water make-up to the SFP

The installed design will provide 2 separate channels separated by distance and powered from two separate sources. Each instrument channel is provided with battery back-up.

2 Milestone Accomplishments

No new milestones were completed during the update period.

3 Milestone Schedule Status

There are no changes to the schedule as reported in Reference 1 of Section 8.

4 Changes to Compliance Method

No changes were made during the update period.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

H. B. Robinson Steam Electric Plant, Unit No. 2 expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

There are no open items documented in the OIP or in the Interim Staff Evaluation (ISE) (Reference 3 of Section 8).

7 Potential Interim Staff Evaluation Impacts

There are no potential impacts to the ISE identified at this time.

8 References

The following references support the updates to the OIP described in this enclosure:

1. Duke Energy Letter, *Duke Energy Carolinas, LLC, (Duke Energy) Overall Integrated Plans in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051),* dated February 28, 2013, ADAMS Accession No. ML13086A095.
2. Duke Energy Letter, *Duke Energy Carolinas, LLC, (Duke Energy), First Six-month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051),* Dated August 26, 2013, ADAMS Accession No. ML13242A009.
3. NRC Letter, *H. B. Robinson Steam Electric Plant, Unit 2 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0793)* dated November 19, 2013, ADAMS Accession No. ML13273A481.