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Serial: RNP-RA/14-0040

MAY 09 2014

10 CFR 50.55a

Attn: Document Control Desk
United States 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

RELIEF REQUEST (RR)-10 FOR EXPANDED APPLICABILITY FOR USE OF ASME CODE CASE N-532-4, REPAIR/REPLACEMENT ACTIVITY DOCUMENTATION REQUIREMENTS AND INSERVICE SUMMARY REPORT PREPARATION AND SUBMISSION IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i)

Pursuant to 10 CFR 50.55a(a)(3)(i), Duke Energy Progress, Inc. hereby requests NRC approval of the following request for the fifth 10-year inservice inspection (ISI) interval for the H. B. Robinson Steam Electric Plant, Unit No. 2 for relief from the requirements of paragraph IWA-2441(b) of ASME Code Section XI, 2007 Edition through the 2008 Addenda. The details of the 10 CFR 50.55a request are enclosed.

Approval of the proposed relief request is requested by May 09, 2015.

This letter contains no new Regulatory Commitments.

If you have any questions concerning this matter, please contact Mr. Richard Hightower, Manager – Nuclear Regulatory Affairs at (843)-857-1329.

Sincerely,

W.R. Hightower Sr
Sharon W. Peavyhouse
Director – Nuclear Org. Effectiveness

SWP/jmw

Enclosure: H. B. Robinson Steam Electric Plant, Unit No. 2, Relief Request (RR)-10 for Expanded Applicability for Use of ASME Code Case N-532-4, Repair/Replacement Activity Documentation Requirements and Inservice Summary Report Preparation and Submission

cc: Mr. V. M. McCree, NRC Region II
Ms. Martha C. Barillas, NRC Project Manager, NRR
NRC Resident Inspector, HBRSEP Unit No. 2

ADU7
NRR

ENCLOSURE

H. B. Robinson Steam Electric Plant, Unit No. 2, Relief Request (RR)-10 for Expanded Applicability for Use of ASME Code Case N-532-4, Repair/Replacement Activity Documentation Requirements and Inservice Summary Report Preparation and Submission

Relief Request No RR-10

Request for Relief for Expanded Applicability for use of ASME Code Case N-532-4, Repair/Replacement Activity Documentation Requirements and Inservice Summary Report Preparation and Submission In Accordance with 10 CFR 50.55a(a)(3)(i)

ASME Code Components Affected:

Code Class:	All Classes
Examination Category:	IWA-2441(b) and ASME Code Case N-532-4
Item Number:	N/A
Description:	NA Expanded Applicability for use of ASME Code Case N-532-4, "Repair/Replacement Activity Documentation Requirements and Inservice Summary Report Preparation and Submission"
Component Number:	N/A

Applicable Code Edition and Addenda:

The H. B. Robinson Steam Electric Plant, Unit 2 (HBRSEP2) Fifth Ten Year Inservice Inspection Interval (ISI) program is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 2007 Edition through the 2008 Addenda.

Applicable Code Requirement:

IWA-2441(b) requires Code Cases be applicable to the Edition and Addenda specified in the Inspection Plan.

ASME Code Case N-532-4, "Repair/Replacement Activity Documentation Requirements and Inservice Summary Report Preparation and Submission," provides requirements that may be used to document repair/replacement activities.

Reason for Request

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative will provide an acceptable level of quality and safety.

On July 21, 2012 HBRSEP2 started its fifth ten-year interval ISI program under the requirements of the 2007 Edition through the 2008 Addenda of ASME Section XI. When implementing this Edition of ASME Section XI, Paragraph IWA-2441(b) requires code cases be applicable to the Edition and Addenda specified in the Inspection Plan.

ASME Code Case N-532-4 has an applicability limited up to the 2004 Edition through the 2005 Addenda, which is identified in the latest applicability index for ASME Section XI Code Cases. Since ASME Code Case N-532-4 only applies up to the 2004 Edition through the 2005 Addenda, Paragraph IWA-2441(b) does not allow the use of ASME Code Case N-532-4 for the HBRSEP2 fifth ten-year interval ISI program.

Proposed Alternative and Basis for Use:

HBRSEP2 requests the applicability of ASME Code Case N-532-4 be extended to the 2007 Edition through the 2008 Addenda for use in the plant's fifth interval ISI program. The NRC has accepted the use of ASME Code Case N-532-4 as an acceptable method for repair/replacement activity documentation requirements and inservice summary report preparation and submission in the latest revision of Regulatory Guide 1.147, Revision 16.

No technical changes to ASME Code Case N-532-4 are being proposed in this relief request. This relief request is being submitted to correct a timing situation, which has resulted from the application of the 2007 Edition through the 2008 Addenda of ASME Section XI for HBRSEP2. Since no technical change is proposed in this relief request, HBRSEP2 considers that this alternative provides an acceptable level of quality and safety, and is consistent with provisions of 10 CFR 50.55a(a)(3)(i).

Duration of Proposed Alternative:

Relief is requested for the fifth ten-year ISI interval for HBRSEP2. The fifth ten-year ISI interval began on July 20, 2012 and ends on July 19, 2021.

Precedents:

Oyster Creek Nuclear Generating Station, (Relief Request I5R-07) (TAC No. ME9494)
Dated August 6, 2013