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SUBJECT: Requests relief from ASME Code scheduling requirements for reactor pressure vessel exam categories B-A, B-D, B-F, B-G-1 & B-N-1 at facility. Relief requested, including Code requirements, basis for relief & proposed alternative encl.

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Robinson File No.: 13510  
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United States Nuclear Regulatory Commission  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR RELIEF FROM ASME CODE SCHEDULE REQUIREMENTS

Gentlemen:

The purpose of this letter is to request specific relief, in accordance with 10 CFR 50.55a(g)(5), from the ASME Code scheduling requirements for reactor pressure vessel examination categories B-A, B-D, B-F, B-G-1, and B-N-1 at the H. B. Robinson Steam Electric Plant, Unit No. 2. The enclosure identifies the specific relief requested, including the Code requirements, the basis for the relief, and the proposed alternative.

The relief involves inspections which are planned for Refueling Outage 16, currently scheduled for April 1995, and the application of this relief is expected to enhance personnel safety, provide an opportunity to simplify the scheduling of the outage, and significantly decrease the duration and cost. Approval of this relief is requested by January 1995 in order to support planning for the outage.

This request is similar to relief granted by letter dated April 7, 1992, for the North Anna Power Station, Unit 1, and by letter dated November 5, 1992, for North Anna Power Station, Unit 2.

Questions regarding this matter may be referred to Mr. K. R. Jury at (803) 383-1363.

Very truly yours,

R. M. Krich  
Manager - Regulatory Affairs

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JSK:dwm  
Enclosure

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Highway 151 and SC 23 Hartsville SC

AD-17

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II  
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP  
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

Request for Relief, ASME scheduling requirements for Reactor Pressure Vessel (RPV) examination categories B-A, B-D, B-F, B-G-1 and B-N-1.

Code Requirement: Section XI, Table IWB-2500-1, examination category B-A, item B1.30 requires a 100% volumetric examination of the RPV shell-to-flange weld as defined by Figure IWB-2500-4. Fifty percent of the examination shall be completed by the end of the first inspection period and the remainder by the end of the third inspection period. Partial deferral is allowed if an examination is conducted from the flange face; the remaining volumetric examinations from the vessel wall may be performed at or near the end of the interval.

Examination category B-D, items B3.90 And B3.100 require a 100% volumetric examination of the RPV nozzle-to-vessel welds and nozzle inside radius sections as defined by Figure IWB-2500-7. At least 25% but not more than 50% (credited) of the nozzles shall be examined by the end of the first inspection period, and the remainder by the end of the inspection interval.

Examination category B-F, item B5.10 And B5.130 require a 100% volumetric and surface examination of the RPV nozzle-to-safe end welds, and safe end-to-pipe welds that are nominal pipe size 4 inch or larger as defined by Figure IWB-2500-8. These examinations may be performed coincident with vessel nozzle examinations required by examination category B-D.

Examination category B-G-1, item B6.40 requires a 100% volumetric examination of the threads in the RPV flange as defined by Figure IWB-2500-12. Deferral to the end of the interval is not permissible.

Examination category B-N-1, item B13.10 requires visual examination VT-3 of the RPV interior (accessible areas) each inspection period, deferral to the end of the interval is not permitted.

Code Relief Request: Relief is requested to alter the inspection schedule requirements by performing all of the remaining code required RPV examinations during the third inspection period of the third interval. Performance of these examinations will establish the new ten-year schedule for the examination of the following welds and components:

<u>Examination Category/Item</u>	<u>ID number</u>
B-A/B1.30	Flange-to-Shell Weld #3
B-D/B3.90	Hot Leg Nozzle-to-Vessel Welds 29, 31 & 33
B-D/B3.100	Hot Leg Nozzle Inside Radii 29, 31 & 33
B-G-1/B6.40	Stud holes 1 through 25
B-F/B5.10; B5.130	Hot Leg Nozzle-to Safe End Weld #1 DM, Safe End-to-Pipe Weld #1 on Each Loop (6 welds)
B-N-1/B13.10	Vessel interior

Basis For Requesting Relief: Relief is requested from the Code scheduling requirements. The third interval for H.B.Robinson Steam Electric Plant, Unit No. 2, began February 19, 1992, and concludes February 19, 2002. As part of the 1st & 2nd ISI intervals, examinations were conducted on the RPV using the automated vessel tool as follows:

Code exams were performed at the end of the first 10 year interval along with the additional guidance of Regulatory Guide 1.150, Revision 0 in 1982.

Code exams were performed in the first 40 month period of the second ten year interval in 1984 along with the additional guidance Regulatory Guide 1.150, Revision 1.

At the end of the second 10 year interval all category B-A welds (with the exception of the three non-beltline region longitudinal welds in the upper shell) were examined along with 100% volumetric examination of the six nozzles to shell and their associated nozzle to safe-end and safe-end to pipe weld configurations. Additionally, the threaded stud holes and the reactor vessel interior and internals were examined as required. The additional guidance of Regulatory Guide 1.150, Revision 1 were also implemented. These exams were completed on October 27, 1990.

In addition to the Code required exams, 100% of all category B-A, Item B1.10 welds are scheduled for the end of the third ten year interval as required by the new rules.

Proposed alternative: Carolina Power & Light Company proposes that the required third 10 year interval, first period examinations be combined with the requirements of the last period of the third 10 year interval exams. Additionally, the ten year exams will be accelerated forward such that all examinations will be performed on or before October 27, 2000. Thus no exams will exceed a 10 year span between examinations. Given the code allowed extensions for a ten year interval, these same examinations under "normal" scheduling could be performed as late as February 2003.

Based on the above extensive examinations that have been performed and that the currently scheduled 100% of all category B-A, Item B1.10 welds will be accelerated forward by more than 2 years, Carolina Power & Light Company believes that this approach is in keeping with good safety practices and creates no safety concerns.