



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

May 5, 2016

LICENSEE: Duke Energy Progress, Inc.

FACILITY: H. B. Robinson Steam Electric Plant Unit No. 2

SUBJECT: SUMMARY OF THE H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2 – FEBRUARY 9-10, 2016, AUDIT ASSOCIATED WITH LICENSE AMENDMENT REQUEST TO TRANSITION TO THE NATIONAL FIRE PROTECTION ASSOCIATION 805 STANDARD (CAC NO. MF2746)

By letter dated September 16, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13267A211), Duke Energy Progress, Inc. (Duke Energy), the licensee for the H. B. Robinson Steam Electric Plant Unit No. 2 (Robinson), submitted a license amendment request (LAR) to adopt a new fire protection licensing basis that complies with the requirements of Title 10 of the *Code of Federal Regulations*, Sections 50.48(a) and (c); the guidance in Regulatory Guide 1.205, Revision 1, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants"; and National Fire Protection Association 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants" (2001 Edition). The purpose of this summary is to document the results of the audit performed February 9-10, 2016, associated with this LAR.

On November 20, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff e-mailed the licensee a request for additional information (RAI) in draft form (ADAMS Accession No. ML15324A328). The NRC staff determined an audit would be the most effective approach to (1) review nondocketed information associated with the draft RAIs and (2) establish an understanding of the draft RAIs to allow the NRC staff to issue a clear request for information and for the licensee to provide quality and timely responses. The audit was held at the licensee's offices in Charlotte, North Carolina. The audit plan dated January 8, 2015, is available in ADAMS under Accession No. ML15342A205.<sup>1</sup> A list of audit participants is provided in Enclosure 1.

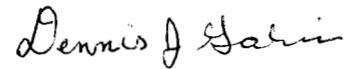
During the audit, the NRC and licensee staff discussed the draft RAIs e-mailed on November 20, 2016, and supplemental information that would support completion of the NRC staff's review. The licensee identified additional RAI responses that would be revised, which the NRC and licensee staff also discussed. The LAR and nondocketed information was discussed as needed. A summary of the RAIs and supplemental information discussed is provided in Enclosure 2. As a result of the audit, the staff clarified PRA RAI 15.01.01.01. By letter dated March 2, 2016, the NRC staff transmitted the RAIs to the licensee (ADAMS Accession No. ML16048A349). The March 2, 2016, letter documents the RAIs to be revised and the agreed upon RAI response dates.

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<sup>1</sup> The audit was originally planned for January 26-27, 2016. Due to adverse weather conditions, the audit was moved to February 9-10, 2016. The audit plan was not revised to reflect the new audit dates as no other aspects of the audit plan changed.

Please direct any inquiries to me at (301) 415-6256 or [Dennis.Galvin@nrc.gov](mailto:Dennis.Galvin@nrc.gov).

Sincerely,

Handwritten signature of Dennis J. Galvin in cursive script.

Dennis Galvin, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

1. List of Participants
2. Summary of RAI Discussions

cc w/enclosures: Distribution via Listserv

LIST OF ATTENDEES

FEBRUARY 9-10, 2016, AUDIT OF DUKE ENERGY PROGRESS, INC.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

LICENSE AMENDMENT REQUEST REGARDING

TRANSITION TO THE NATIONAL FIRE PROTECTION ASSOCIATION 805 STANDARD

**U.S. Nuclear Regulatory Commission**

- Alex Klein
- Harold Barrett
- Steve Dinsmore
- Daniel O'Neal
- Leslie Fields
- JS Hyslop\*
- Brian Metzger\*

**Pacific Northwest National Laboratory (NRC Contractors)**

- Garill Coles\*
- Steve Short\*
- William Ivans\*

**Duke Energy Progress, Inc.**

- Jeffrey Ertman Duke Energy
- Alan Holder Duke Energy
- Ronnie Williamson Duke Energy
- Bruce Morgen Duke Energy
- Jamie McCrory Duke Energy
- Edmond Wiegart Duke Energy
- Kelly Lavin Duke Energy
- Harold Stiles Duke Energy
- Cathy Chan Duke Energy
- David Miskiewicz Engineering Planning and Management, Inc.
- Brian Krystok Engineering Planning and Management, Inc.
- Joelle DeJoseph Jensen Hughes

\*Participated in audit by telephone conference

## **Summary of Request for Information Discussions**

During the audit, the U.S. Nuclear Regulatory Commission (NRC) and licensee staff discussed the draft requests for additional information (RAIs) e-mailed on November 20, 2016, and supplemental information that would support completion of the NRC staff's review. The licensee identified additional RAI responses that would be revised, which the NRC and licensee staff also discussed. A summary of these discussions is below.

Aside from the changes or additions discussed below, the NRC staff stated that further probabilistic risk assessment (PRA)-related information to complete the review was not needed at this time, although additional information may be identified as the safety evaluation is finalized.

### **RAIs in Draft RAI email dated November 20, 2015 and RAI Letter dated March 2, 2016**

#### PRA RAI 03.b.01

Discussed need to update table in the RAI response with final actions/responses related to all RAIs.

For example, the discussion in draft table responding to PRA RAI 03.b.01 about PRA RAI 01.c mentions a sensitivity study that would not be necessary when an acceptable method to include nontraced cables was used.

#### PRA RAI 05.c.01

RAI and possible response discussed, no changes to RAI.

#### PRA RAI 15.01.01.01

RAI revised removing irrelevant discussion and requested information updated with more detailed descriptions.

#### PRA RAI 16.01.01

RAI and possible response discussed, no changes to RAI.

#### PRA RAI 30.02

RAI and possible response discussed, no changes to RAI.

### **RAI Responses to be Revised**

In addition to the discussion on the new RAIs listed above, the licensee stated that they were going to provide supplemental responses to the following RAIs.

PRA RAI 18.01

The licensee stated that they will include an additional room in the final response.

PRA RAI 23.a

The licensee clarified that they are changing the method to estimate the additional risk of recovery actions and will re-submit the response to this RAI with a description of the new method. This will also require re-submitting the response to PRA RAI 24.01, PRA RAI 24.b, and PRA RAI 24.c with conforming changings.

Attachments C, G, H editorial clean up, J, M, S, V, W.

The licensee stated that there will be changes to Attachments C, G, H , J, M, S, V, W with changes to Attachments C, G, H being editorial.

Please direct any inquiries to Dennis Galvin at (301) 415-6256 or [Dennis.Galvin@nrc.gov](mailto:Dennis.Galvin@nrc.gov).

Sincerely,

*/RA/*

Dennis Galvin, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

1. List of Participants
2. Summary of RAI Discussions

cc w/enclosures: Distribution via Listserv

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DGalvin, NRR	GCasto, NRR	SDinsmore, NRR
DO'Neal, NRR	JHyslop, NRR	BMetzger, NRR

**ADAMS Accession No.: PKG ML16123A039 Summary: ML16123A036** \*by memo

OFFICE	DORL/LPLII-2/PM	DORL/LPLII-2/LA	DRA/AFP/PM*	NRR/DRA/AFP*
NAME	DGalvin	BClayton	LFields	HBarrett
DATE	5/4/2016	5/3/2016	4/4/2016	4/4/2016
OFFICE	DRA/APLA/BC*	DORL/LPLII-2/BC	DORL/LPLII-2/PM	
NAME	SRosenberg	BBeasley	DGalvin	
DATE	4/4/2016	5/5/2016	5/5/2016	

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