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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

**SUBMITTAL OF THE PWROG-14048-P, REVISION 1, TO SATISFY THE REGULATORY
COMMITMENT RELATED TO THE PRESSURIZED WATER REACTOR INTERNALS
PROGRAM PLAN FOR AGING MANAGEMENT OF REACTOR INTERNALS (TAC NO. ME9633)**

References:

1. Pressurized Water Reactor Owners Group letter to NRC. "PWR Owners Group Submittal of PWROG-14048-P, Revision 1, "Functionality Analysis: Lower Support Columns," dated March 1, 2017 (ADAMS Accession No. ML 17066A266)

Ladies and Gentlemen:

By letter dated February 08, 2016 (ADAMS Accession Number: ML16019A053), the NRC requested that Duke Energy, respond to a request for additional information (RAI) regarding the Aging Management Program for the Reactor Vessel Internals at H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

The Duke Energy response to this request (RAI-5(b)-1-2) was provided in Enclosures 1 and 2 of the Duke Energy letter, dated February 18, 2016 (ADAMS Accession Number: ML16054A159). In particular, Enclosure 2 of the Response to RAI-5(b)-1-2, contained a regulatory commitment for the Staff's consideration, related to the HBRSEP, Unit No. 2, Cast Austenitic Stainless Steel(CASS) Lower Support Columns (LSC) in the Reactor Vessel.

By letter dated December 15, 2016, the NRC issued a Staff Assessment (ADAMS Accession Number: ML16281A510), which concluded the HBRSEP, Unit No. 2, Reactor Vessel Internals Aging Management Program Plan is acceptable because it is consistent with the inspection and evaluation guidelines of Materials Reliability Program Report (MRP)-227-A, "Pressurized Water Reactor Internals Inspection and Evaluation Guidelines" and it has adequately addressed all eight specified licensee action items.

In the Staff Assessment, the NRC concurred with the establishment of the above mentioned commitment and the Duke Energy's HBRSEP, Unit No. 2, approach to utilize the industry PWROG-14048-P report to provide justification of plant-specific applicability related to HBRSEP, Unit No. 2, specific parameters and operating conditions. The HBRSEP, Unit No. 2, made a commitment to submit a revised version of the PWROG-14048-P, Revision 0, report by June 30, 2017.

The technical report associated with tasks related to PWROG-14048-P, has been revised and submitted to the NRC via the PWR Owners Group, for information only, as detailed in Reference 1. It is noted, HBRSEP, Unit No. 2, is identified as Plant J in the stated analysis. This analysis concludes that there is reasonable assurance that the Lower Support Columns (LSCs) will remain functional through the period of extended operation, the LSCs show considerable tolerance to the existence of potential flaws, and that inspections are not necessary to ensure the functionality of the LSCs through the period of extended operation.

A copy of the regulatory commitment originally made in Response to RAI-5(b)-1-2, and explicitly referred to in the Staff Assessment, is reproduced in the Enclosure to this letter. The submittal of the PWROG-14048-P, Revision 1, hereby satisfies the regulatory commitment related to the Staff Assessment and the RAI-5(b)-1-2. There are no additional regulatory commitments made in this submittal. If you have any questions regarding this submittal, please contact Mr. Tony Pilo, Manager – Nuclear Regulatory Affairs, at (843) 857-1409.

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

Executed On: 29 JUNE 2017

Sincerely,

A handwritten signature in blue ink, appearing to read 'E. Kapopoulos', is written over the 'Sincerely,' text.

Ernest J. Kapopoulos, Jr.
Site Vice President

EJK/am

Enclosure: Regulatory Commitment (reproduced from RAI-5(b)-1-2)

cc: NRC Regional Administrator, NRC, Region II
D. Galvin, NRC Project Manager, NRR (w/o Enclosures)
NRC Resident Inspector, HBRSEP Unit No. 2

United States Nuclear Regulatory Commission
Enclosure to Serial: RNP-RA/17-0042
2 Pages (including cover page)

REGULATORY COMMITMENT
(REPRODUCED FROM RAI-5(b)-1-2)

REGULATORY COMMITMENT

The following table identifies the action committed to by H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, in this submittal. All other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

	COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE/EVENT
		ONE- TIME ACTION	CONTINUING COMPLIANCE	
1	<p>Robinson will submit a copy of the Technical Report associated with tasks related to PWROG PA-MSC-1103, Revision 2, to the NRC by June 30, 2017.</p> <p>The stated Technical Report will contain RNP applicable flaw tolerance analysis developed based upon PWROG-14048-P, as reflected in RAI-5(b)-1-2, of the NRC Letter, dated February 08, 2016 (ADAMS Accession Number: ML16019A053).</p> <p>In particular, this Technical Report will address Action Item 7 from the NRC final safety evaluation (SE) (ADAMS Accession No. ML 11308A770) of the Materials Reliability Program (MRP)-227-A report, "Pressurized Water Reactor Internals Inspection and Evaluation Guidelines" (ADAMS Accession No. ML 120170453) in reference to the functionality of the Lower Support Columns.</p>	X		June 30, 2017