



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

November 21, 2017

Mr. Ernest J. Kapopoulos, Jr.  
Site Vice President  
H. B. Robinson Steam Electric Plant  
Duke Energy Progress, LLC  
3581 West Entrance Road, RNPA01  
Hartsville, SC 29550

**SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2 – AUDIT PLAN AND SETUP OF ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT FREQUENCIES TO SUPPORT 24-MONTH FUEL CYCLES (CAC NO. MF9544; EPID L-2017-LLA-0206)**

Dear Mr. Kapopoulos:

By letter dated April 3, 2017, as supplemented by a second letter dated April 3, 2017, and letters dated May 2, 2017, and September 28, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML17093A787, ML17093A796, ML17122A223, and ML17272A015, respectively), Duke Energy Progress, LLC (the licensee) submitted a license amendment request for H. B. Robinson Steam Electric Plant Unit No. 2. The proposed amendment would revise certain technical specification surveillance requirements and administrative controls program frequencies from 18 months to 24 months to support 24-month fuel cycle operations.

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) reviews, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff limited read-only access to non-docketed licensee information (e.g., calculations and procedures) referred to in the request for additional information issued November 20, 2017 (ADAMS Accession No. ML17307A010). The NRC staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit non-docketed licensee information to confirm that the information supports statements made in the license amendment request and to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

The audit may also include interactions (e.g., teleconferences, webinars, or face-to-face interactions) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available on the online reference portal. The face-to-face interactions would be conducted either in the vicinity of the NRC headquarters or at the

licensee's site, if it is determined such interactions are an effective manner to resolve issues identified during the desk portion of the audit.

Use of the online reference portal is acceptable as long as the following conditions are met:

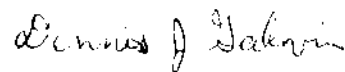
- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff requests that the portal be populated with the documents referred to in the draft request for additional information. The staff may request additional documents during the review, which will be transmitted to you by e-mail. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as username and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that Duke Energy Progress, LLC agrees to the terms and conditions set forth in this letter.

If you have any questions, please contact me at (301) 415-6256 or [Dennis.Galvin@nrc.gov](mailto:Dennis.Galvin@nrc.gov).

Sincerely,



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

Docket No. 50-261

Enclosure:  
Audit Plan

cc w/Enclosure: Distribution via Listserv

AUDIT PLAN BY THE OFFICE OF NUCLEAR REGULATORY REGULATION  
DUKE ENERGY PROGRESS, LLC  
H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2  
PROPOSED LICENSE AMENDMENT TO REVISE TECHNICAL SPECIFICATION  
SURVEILLANCE REQUIREMENT FREQUENCIES TO SUPPORT 24-MONTH FUEL CYCLES  
DOCKET NO. 50-261

1.0 BACKGROUND

By letter dated April 3, 2017, as supplemented by a second letter dated April 3, 2017, and letters dated May 2, 2017, and September 28, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML17093A787, ML17093A796, ML17122A223, and ML17272A015, respectively), Duke Energy Progress, LLC (the licensee) submitted a license amendment request (LAR) for H. B. Robinson Steam Electric Plant Unit No. 2. The proposed amendment would revise certain technical specifications surveillance requirements and administrative controls program frequencies from 18 months to 24 months to support 24-month fuel cycle operations. The LAR includes information to address the guidance in Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991 (ADAMS Accession No. ML031140501). In the request for additional information (RAI) issued November 20, 2017 (ADAMS Accession No. ML17307A010), the U.S. Nuclear Regulatory Commission (NRC) staff requested that Duke Energy Progress, LLC make certain information available for an audit.

2.0 REGULATORY AUDIT BASES

An audit was determined to be the most efficient approach for the timely resolution of questions associated with this LAR review since the NRC staff will be able to minimize further rounds of RAIs. The staff requests that certain non-docketed information be placed in an online reference portal to support a desk audit by the NRC staff. Upon completion of this audit, the staff expects to confirm that the non-docketed licensee information supports the licensee statements in the LAR. The audit information the NRC staff determines to be necessary to support the NRC staff's safety evaluation will be requested to be submitted on the docket.

3.0 REGULATORY AUDIT SCOPE OR METHODOLOGY

The audit is being conducted to support the resolution of the issues identified in the NRC staff's RAIs dated November 20, 2017. The regulatory audit will address the items in the regulatory audit bases section. The audit will be initially conducted as a desk audit to review information made available in an online reference portal. The audit may include interactions (e.g., teleconferences, webinars, or face-to-face interactions) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the available information.

#### 4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The information required for the initial desk audit was specified in the RAIs issued November 20, 2017. The licensee will be informed by e-mail if additional supporting documentation is needed.

#### 5.0 TEAM ASSIGNMENTS

Key licensee personnel involved in the development of the RAI responses should be made available for interactions on a mutually agreeable schedule to respond to any questions from the NRC staff.

<b>Team Member</b>	<b>Title</b>	<b>Division</b>	<b>Area of Responsibility</b>
Dennis Galvin	Project Manager	NRR/DORL/LPL2	Project Management
Gursharan Singh	Electronics Engineer	NRR/DE/EICB	Technical Review
Richard Stattel	Senior Electronics Engineer		

#### 6.0 LOGISTICS

The audit will begin once an electronic portal is set up and the documentation is made available to the NRC staff. The initial desk audit will be conducted over several weeks, consistent with the schedule for the licensee to respond to the RAIs. The licensee will be kept informed of the progress of the audit during biweekly discussions with the project manager. The audit may include interactions (e.g., teleconferences, webinars, or face-to-face interactions) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the available information. The face-to-face interactions would be conducted either in the vicinity of the NRC headquarters or at the licensee's site, if it is determined such interactions are an effective manner to resolve issues identified during the desk portion of the audit.

#### 7.0 DELIVERABLES

The NRC team will develop an audit summary report to convey the audit results. The report will be placed in ADAMS within 90 days of the completion of the final audit session. The audit information the NRC staff determines to be necessary to support the NRC staff's safety evaluation will be requested to be submitted on the docket.

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**ADAMS Accession No.: ML17310A404** \*by email

OFFICE	NRR/DORL/LPL2-2/PM	NRR/DORL/LPL2-2/LA	NRR/DE/EICB/BC*	NRR/DORL/LPL2-2/BC
NAME	DGalvin	BClayton (LRonewicz for)	MWaters	UShoop
DATE	11/16/17	11/15/17	11/03/17	11/21/17

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