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10 CFR 50.90
10 CFR 50.69

Serial: RNP-RA/18- 0028

JUN 06 2018

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

H. B. Robinson Steam Electric Plant, Unit 2
Docket No. 50-261/Renewed Facility Operating License No. DPR- 23

Subject:

Supplement to the Application to Adopt 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors"

REFERENCE(s):

1. Duke Energy letter, Application to Adopt 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors", dated April 5, 2017 (ADAMS Accession No. ML18099A130)

In accordance with the provisions of 10 CFR 50.69 and 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy) is providing a supplement to Reference 1 to correct an editorial error/omission in the proposed amendment to the license of H. B. Robinson Steam Electric Plant, Unit 2 (HBRSEP2). Section 2.3 of Reference 1 is being revised to correct the amendment date and Section 3.3 is being revised to reflect the omission of a focused scope peer review completed in 2017 to resolve an upgrade.

The enclosure to this letter provide the revised sections.

The conclusions of the original Significant Hazards Consideration Determination and Environmental Considerations contained in the April 5, 2018 LAR (Reference 1) are unaffected as a result of this supplemental response.

This letter contains no new regulatory commitments.

Please refer any questions regarding this submittal to Art Zaremba at (980) 373-2062.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 06JUNE, 2018.

Sincerely,

Ernest J. Kapopoulos, Jr.
Site Vice President

Enclosure:
1. Revised Sections 2.3 and 3.3.

cc (with enclosure):

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2.3 DESCRIPTION OF THE PROPOSED CHANGE

Duke Energy proposes the addition of the following condition to the renewed operating license of HBRSEP2 to document the NRC's approval of the use 10 CFR 50.69.

> Duke Energy is approved to implement 10 CFR 50.69 using the processes for categorization of Risk-Informed Safety Class (RISC)-1, RISC-2, RISC-3, and RISC-4 SSCs specified in the license amendment request dated ~~March 22, 2018~~ April 5, 2018.
>
> Prior NRC approval, under 10 CFR 50.90, is required for a change to the categorization process specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach).

3.3 PRA REVIEW PROCESS RESULTS (10 CFR 50.69(b)(2)(iii))

The PRA models described in Section 3.2 has been assessed against RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," Revision 2 (Reference 6) consistent with NRC RIS 2007-06.

The HBRSEP2 internal events PRA model was subject to a self-assessment and a full-scope peer review conducted in May 2010. This peer review covered all applicable SRs except internal flooding, which was assessed at a later date. In August 2017, the F&O Closure process identified an upgrade. Subsequently, a focused scope industry peer review was conducted for this model area (steam generator tube rupture, SR LE-D6) with no finding level F&Os identified.

The HBRSEP2 internal flood PRA model was subject to a self-assessment and full-scope peer review conducted in August 2015.

The HBRSEP2 Fire PRA model was subject to a self-assessment and full-scope peer review conducted in May 2013, and a focused scope peer review in August 2013, and a focused scope peer review in February 2018.

Closed findings were reviewed and closed in August 2017 for HBRSEP2 Internal Events, internal Flood, and Fire models using the process documented in Appendix X to NEI 05-04, NEI 07-12 and NEI 12-13, "Close-out of Facts and Observations" (F&Os) (Reference 13) as accepted by NRC in the letter dated May 3, 2017 (ML17079A427) (Reference 14). The results of this review have been documented and are available for NRC audit.

Attachment 3 provides a summary of open findings and disposition of the HBRSEP2 peer reviews. The attachments identified above demonstrates that the PRA is of sufficient quality and level of detail to support the categorization process, and has been subjected to a peer review process assessed against a standard or set of acceptance criteria that is endorsed by the NRC as required 10 CFR 50.69(c)(1)(i).