

From: [Jordan, Natreon](#)
To: [Zaremba, Arthur H.](#)
Cc: [Shoop, Undine](#)
Subject: FW: Acceptance Review for Volumetric or Surface Examination of Code case N-729-4 Examinations of the Reactor Pressure Vessel Upper Head
Date: Monday, July 29, 2019 9:45:00 AM

Mr. Zaremba,

Pursuant to Title 10 of the *Code of Federal Regulations* 50.55a(z)(1), by letter dated July 10, 2019 (Agencywide Documents Access and Management System Accession No. ML19191A139), Duke Energy (the licensee) submitted a request for U.S. Nuclear Regulatory Commission (NRC) staff review and approval to extend the examination frequency of Reactor Vessel Closure Head (RVCH) nozzles and partial-penetration welds from the September 2020 refueling outage to the refueling outage scheduled to commence in September 2024 for the H.B. Robinson Electric Plant, Unit 2. Specifically, the licensee requested approval for the use of an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Code Case N-729-4, "Alternative Examination Requirements for PWR [Pressurized Water Reactor] Reactor Vessel Upper Heads With Nozzles Having Pressure-Retaining Partial-Penetration Welds Section XI, Division 1." The licensee requested NRC authorization to use a revised examination frequency for its RVCH nozzles and partial penetration welds, on the basis that the proposed alternative provides an acceptable level of quality and safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an assessment regarding the acceptability of the proposed request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, you should be aware that there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that review of the proposed alternative will take approximately 160 hours to complete. The NRC staff expects to complete the review of the licensing action by July 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the request and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. If you have any questions, please contact me at (301) 415-7410.

Thanks,

Natreon (Nate) Jordan

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