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Carolina Power & Light Company

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ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550
JAN 16 1987

Robinson File No: 13510E

Serial: RNP/86-6017

Mr. David M. Verrelli, Chief
U. S. Nuclear Regulatory Commission, Region II
101 Marietta Street NW
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
INSPECTION REPORT 86-12

Dear Mr. Verrelli:

USNRC Inspection Report 86-12 included information that closed IE Bulletin 82-02, "Degradation of Threaded Fasteners in the Reactor Coolant Pressure Boundary of PWR Plants," for our facility. The inspector, W. P. Kleinsorge, reviewed our letters of July 30, 1982 and March 8, 1985, and determined that the requested actions of the bulletin have been acceptably addressed. Mr. Kleinsorge also held discussions with responsible engineers, reviewed supporting documentation, and observed representative samples of work to verify that the actions identified in the letters of response have been completed.

IE Bulletin 82-02 allows licensees who are committed to the provisions of Regulatory Guide 1.65, "Materials and Inspection for Reactor Vessel Closure Studs," to exclude reactor vessel head closure studs from the actions required by the bulletin. In our July 30, 1982 response letter, we stated that although H. B. Robinson Unit 2 is not committed to Regulatory Guide 1.65, the reactor vessel head studs are inspected in accordance with ASME Section XI. We also stated that there have been no cases of reactor vessel head stud degradation. In our March 8, 1985 response letter, we identified procedures which include the requirements for threaded fasteners, one of which was FHP-015, "Reactor Vessel Stud Removal and Replacement," and we stated that there have been no identified corrosion problems associated with bolts or studs in reactor coolant pressure boundary closures within the scope of IE Bulletin 82-02 and no instances of stress corrosion cracking of threaded fasteners associated with lubricants or injection sealants.

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The scope of Actions/Items listed in IE Bulletin 82-02 is limited to steam generator and pressurizer manway closures and valve bonnets and pump flange connections installed on lines 6 inch diameter and greater. As stated above, the reactor vessel head closure studs are also included unless the licensee is committed to Regulatory Guide 1.65.

Regulatory Guide 1.65 of October, 1973, recommends that studs be examined in accordance with the requirements of Section XI as supplemented by surface examinations in accordance with Paragraph NB-2545 or NB-2546 of Section III of the ASME Code. Since the issue of Regulatory Guide 1.65, Section XI of the ASME Code has required volumetric and surface examination of reactor vessel studs. Currently, studs are examined volumetrically and with wet fluorescent magnetic particle methods. The magnetic particle examination is performed in accordance with Article 7, Section V as required by both Section XI and Paragraph NB-2545. All examinations are performed with the studs removed. Selection is by numbers 1 through 17, 18 through 34, and 35 through 50 for periods 1, 2, and 3, respectively, of the current In-Service Inspection interval. This practice meets the intent of Regulatory Guide 1.65 even though we are not committed to it for compliance.

We have, therefore, deleted the reactor vessel head closure studs from the IE Bulletin 82-02 program since our In-Service Inspection Program addresses the concerns and actions of the bulletin and the Regulatory Guide.

If you have any questions concerning this letter, please contact Mr. J. M. Curley at (803) 383-1367.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson S. E. Plant

DAS:sdm

cc: G. P. Beatty, Jr.
W. P. Kleinsorge (NRC)
H. E. P. Krug (NRC)
G. Requa (NRC)
E. E. Utley
A. R. Wallace