



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

July 9, 2021

LICENSEE: Duke Energy Progress, LLC

FACILITY: H. B. Robinson Steam Electric Plant, Unit 2

SUBJECT: SUMMARY OF JUNE 24, 2021, MEETING WITH DUKE ENERGY PROGRESS, LLC, REGARDING A PROPOSED AMENDMENT CONCERNING TSTF-577, "REVISED FREQUENCIES FOR STEAM GENERATOR FREQUENCIES FOR STEAM GENERATOR TUBE INSPECTIONS" FOR THE H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2 (EPID L-2021-LRM-0060)

On June 24, 2021, an observation public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and Duke Energy Progress, LLC (Duke Energy), the licensee of the H. B. Robinson Steam Electric Plant (Robinson) via teleconference due the COVID-19 Public Health Emergency. The purpose of the meeting was to discuss a future amendment concerning Technical Specification Task Force (TSTF) Traveler TSTF-577, Revision 1, "Revised Frequencies for Steam Generator Tube Inspections." The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML21161A190. A list of attendees is provided as Enclosure 1.

Robinson has three Westinghouse Electric Company (Westinghouse) Model 44F steam generators (SGs) with thermally treated Alloy 600 tubes. The licensee presented information (see ADAMS Accession No. ML21174A321) which summarized the licensee's upcoming proposed license amendment request (LAR) anticipated for submittal in August 2021. The licensee also presented the proposed LAR's technical basis. The licensee intends to request a one-time 72-month inspection interval beginning in late December 2020 without having performed a 100-percent enhanced probe inspection per the TSTF-577 provisions. The licensee presented a technical justification for the variation in terms of the existing degradation mechanisms in the Robinson SGs, the scope of recent inspections, a relatively low hot-leg temperature, the operating fleet experience with the same tube material at other locations, management of loose parts and foreign objects, the amount of secondary side deposits, enhanced inspection of tubes with potentially high residual stress, and the operational assessment (OA) supporting three operating cycles for existing degradation mechanisms before the next inspection.

As an opening statement, the NRC branch chief for the Corrosion and Steam Generator Branch stated that the NRC staff is not expecting to be receiving multiple LARs for exceptions to the recently issued TSTF-577. The NRC staff recognized, however, that since Robinson is the only unit with thermally treated Alloy 600TT tubing that is on a 24-month refueling cycle and that the NRC staff had planned to have plant-specific discussions with the licensee. During the meeting, the NRC staff and licensee discussed several topics including the following:

1. The NRC asked the licensee to discuss the scope of the most recent SG inspections that occurred in the Fall of 2020, including the consideration of the extent of inspection with enhanced probes. The NRC stated that the staff's position on enhanced inspection that is contained in TSTF-577 was not known at the time of the Robinson inspection. The licensee responded that the inspection scope was established 12 months prior to the inspection, and at that time the NRC staff's position on enhanced probe inspections was not known.
2. In response to a question from the NRC staff, the licensee stated that if the proposed LAR is approved they intend to perform a 100-percent enhanced probe inspection in the future. This would permit future 72-month inspection intervals without a LAR if the other provisions of TSTF-577 are met and it is supported by the unit-specific OA.
3. The NRC staff asked if the licensee intended to include stress-corrosion cracking as a potential degradation mechanism in its OA to support the proposed LAR. The NRC staff stated its expectation that stress-corrosion cracking would be addressed despite the plant operating at a relatively low hot-leg temperature. This expectation is based on the operating experience with thermally treated Alloy 600 tubing and the potential for growth of cracks that may have gone undetected in the most recent inspection. The licensee replied that they would consider the NRC staff's input. The NRC staff also stated its expectation that the OA would provide a detailed analysis for foreign objects.

Duke Energy stated they will consider and evaluate the questions, and the technical and licensing comments presented by the NRC staff and, as appropriate, include adequate and sufficient material for the NRC staff to complete the technical review of the future amendment. The NRC staff agreed to provide any additional feedback on the presentation to the NRC project manager by July 2, 2021.

Members of the public were not in attendance. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-5136, or [John.Klos@nrc.gov](mailto:John.Klos@nrc.gov).

*/RA/*

John Klos, Project Manager  
Plant Licensing Branch LPL2-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure:  
List of Attendees

cc: Listserv

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DATED: July 9, 2021.

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JKlos, NRR

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PKlein, NRR

GMakar, NRR

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CAshley, NRR

SBloom, NRR

CScott, NRR

GLentchner, NRR

BRichardson, OEDO

**ADAMS Accession Nos.:**

**Meeting Notice: ML21161A190**

**Meeting Summary: ML21182A220**

**Presentation: ML21174A321**

OFFICE	NRR/DORL/LPL2-2/PM	NRR/DORL/LPL2-2/LA	NRR/DORL/LPL2-2/BC	NRR/DORL/LPL/2-2/PM
NAME	John Klos	Rhonda Butler	Mike Mahoney (A) BC	John Klos
DATE	6/28/2021	7/7/21	7/7/2021	7/9/2021

**OFFICIAL RECORD COPY**

LIST OF ATTENDEES

JUNE 24, 2021  
MEETING WITH DUKE ENERGY PROGRESS, LLC  
REGARDING A PROPOSED AMENDMENT CONCERNING  
TSTF-577, "REVISED FREQUENCIES FOR STEAM GENERATOR  
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FOR THE H. B. ROBINSON STEAM ELECTRIC PLANT,  
UNIT 2 (EPID L-2021-LRM-0060)

<u>ATTENDEE</u>	<u>REPRESENTING</u>
John Klos	NRC
Nate Jordan	NRC
Paul Klein	NRC
Andrew Johnson	NRC
Gregory Makar	NRC
Leslie Terry	NRC
Clinton Ashley	NRC
Steve Bloom	NRC
Christian Scott	NRC
Gabe Lentchner	NRC
Art Zaremba	Duke Energy
Jordan Vaughn	Duke Energy
Etienne Fonteneau	Duke Energy
Dan Mayes	Duke Energy
Doug Coughman	Duke Energy
Scott Linger	Duke Energy
Brad Carpenter	Duke Energy (Westinghouse)