Progress Energy

10 CFR 50.54(f)

Serial: RNP-RA/04-0097

JUL 2 2 2004

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SUBMITTAL OF 60-DAY RESPONSE TO NRC
BULLETIN 2004-01, "INSPECTION OF ALLOY 82/182/600 MATERIALS
USED IN THE FABRICATION OF PRESSURIZER PENETRATIONS AND
STEAM SPACE PIPING CONNECTIONS AT PRESSURIZED-WATER REACTORS"

Ladies and Gentlemen:

Pursuant to 10 CFR 50.54(f), Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), hereby submits the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, 60-day response to NRC Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-Water Reactors."

Attachment I to this letter provides an Affirmation pursuant to the provisions of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f).

Attachment II to this letter provides the information request by the bulletin.

If you have any questions regarding this submittal, please contact Mr. C. T. Baucom at (843) 857-1253.

Sincerely,

J. F. Lucas
Manager - Support Services - Nuclear

Progress Energy Carolinas, Inc.
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville, SC 29550

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JFL/cac

Attachments:

I. Affirmation

II. 60-day Response to NRC Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-Water Reactors"

c: Dr. W. D. Travers, NRC, Region II
Mr. C. P. Patel, NRC, NRR
NRC Resident Inspector

AFFIRMATION

The information contained in letter RNP-RA/04-0097 is true and correct to the best of my information, knowledge, and belief; and the sources of my information are officers, employees, contractors, and agents of Progress Energy Carolinas, Inc., also known as Carolina Power and Light Company. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 7/22/04

C L Burton

C. L. Burton
Director-Site Operations

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

**60-DAY RESPONSE TO NRC BULLETIN 2004-01,
"INSPECTION OF ALLOY 82/182/600 MATERIALS
USED IN THE FABRICATION OF PRESSURIZER PENETRATIONS AND
STEAM SPACE PIPING CONNECTIONS AT PRESSURIZED-WATER REACTORS"**

NRC Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-Water Reactors," in Section (1) of the Requested Information, requires that within 60 days of the issuance of the bulletin all pressurized-water reactor (PWR) licensees provide to the NRC the requested information.

NRC Request

(a) *A description of the pressurizer penetrations and steam space piping connections at your plant. At a minimum, this description should include materials of construction (e.g., stainless steel piping and/or weld metal, Alloy 600 piping/sleeves, Alloy 82/182 weld metal or buttering, etc.), joint design (e.g., partial penetration welds, full penetration welds, bolted connections, etc.), and, in the case of welded joints, whether or not the weld was stress-relieved prior to being put into service. Additional information relevant with respect to determining the susceptibility of your plant's pressurizer penetrations and steam space piping connections to [primary water stress corrosion cracking] PWSCC should also be included.*

Response

Based on a review of technical information and specifications it has been determined that there are no Alloy 82/182/600 materials used in the fabrication of any of the pressurizer penetrations or steam space piping connections for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, pressurizer. No additional information has been determined to be relevant with respect to determining the susceptibility of the HBRSEP, Unit No. 2, pressurizer penetrations and steam space piping connections to PWSCC.

NRC Request

(b) *A description of the inspection program for Alloy 82/182/600 pressurizer penetrations and steam space piping connections that has been implemented at your plant. The description should include when the inspections were performed; the areas, penetrations and steam space piping connections inspected; the extent (percentage) of coverage achieved for each location which was inspected; the inspection methods used; the process used to resolve any inspection findings; the quality of the documentation of the inspections (e.g., written report, video record, photographs); and, the basis for concluding that your plant satisfies applicable*

regulatory requirements related to the integrity of pressurizer penetrations and steam space piping connections. If leaking pressurizer penetrations or steam space piping connections were found, indicate what followup NDE was performed to characterize flaws in the leaking penetrations.

Response

Based on the response to Item (a) above, i.e., there are no Alloy 82/182/600 penetrations or steam space piping connections in the HBRSEP, Unit No. 2, pressurizer, this requested information is not applicable.

NRC Request

(c) *A description of the Alloy 82/182/600 pressurizer penetration and steam space piping connection inspection program that will be implemented at your plant during the next and subsequent refueling outages. The description should include the areas, penetrations and steam space piping connections to be inspected; the extent (percentage) of coverage to be achieved for each location; inspection methods to be used; qualification standards for the inspection methods and personnel; the process used to resolve any inspection indications; the inspection documentation to be generated; and the basis for concluding that your plant will satisfy applicable regulatory requirements related to the structural and leakage integrity of pressurizer penetrations and steam space piping connections. If leaking pressurizer penetrations or steam space piping connections are found, indicate what followup NDE will be performed to characterize flaws in the leaking penetrations. Provide your plans for expansion of the scope of NDE to be performed if circumferential flaws are found in any portion of the leaking pressurizer penetrations or steam space piping connections.*

Response

Based on the response to Item (a) above, i.e., there are no Alloy 82/182/600 penetrations or steam space piping connections in the HBRSEP, Unit No. 2, pressurizer, this requested information is not applicable.