



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931**

September 29, 2003

Carolina Power & Light Company
ATTN: Mr. J. W. Moyer
Vice President
H. B. Robinson Steam Electric Plant Unit 2
3581 West Entrance Road
Hartsville, SC 29550

**SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT - NRC INSPECTION REPORT
50-261/03-11**

Dear Mr. Moyer:

On September 10, 2003, the NRC completed an inspection regarding the application for license renewal for your Robinson facility. The enclosed report documents the inspection findings, which were discussed on September 10, 2003, with members of your staff in an exit meeting at the Robinson site.

The purpose of this inspection was an examination of activities that support the application for a renewed license for the Robinson facility. The inspection consisted of a selected examination of procedures and representative records, and interviews with personnel regarding followup of issues from our previous two license renewal inspections.

This inspection concluded that the applicant had implemented methods to track completion of in progress and future task actions to meet license renewal commitments to the NRC. Modified plant procedures available for NRC review were adequate and transition plans for completion of the license renewal project were of high quality.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

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Should you have any questions concerning this letter, please contact Caudle Julian at 404-562-4603.

Sincerely,

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Charles A. Casto, Director
Division of Reactor Safety

Docket Nos.: 50-261
License Nos.: DPR-23

Enclosure: Inspection Report 50-261/03-11
w/attachment - Supplemental Information

cc w/encl: See page 3

cc w/encl:

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No: 50-261
License No: DPR-23
Report No: 50-261/03-11
Licensee: Carolina Power and Light Company (CP&L)
Facility: H. B. Robinson Steam Electric Plant, Unit 2
Location: 3581 West Entrance Road
Hartsville, SC 29550
Dates: September 8 - 10, 2003
Inspector: Caudle Julian, Reactor Inspector
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000261-03-11; 9/8-10/2003; Carolina Power and Light Company, H. B. Robinson Steam Electric Plant, Unit 2. License Renewal Inspection Program, followup of previous open items.

This inspection of License Renewal activities was performed by one regional office engineering inspector, accompanied by one staff member from the office of Nuclear Reactor Regulation. The inspection program followed was NRC Manual Chapter 2516 and NRC Inspection Procedure 71002. This inspection did not identify any "findings" as defined in NRC Manual Chapter 0612.

During a previous aging management programs inspection documented in NRC Inspection Report 05000261-03-09, the inspectors observed that the applicant had not yet established adequate tracking items in the established plant Action Request system data base to assure future implementation of proposed actions to support license renewal (LR), although the applicant had established a generally thorough task list data base within the LR group. The LR group task list needed to be integrated into the established plant Action Request system to ensure that future actions are accomplished as planned. The lack of integration of future tasks into the established site Action Request system had been previously identified via an applicant audit of the LR program. Completion of this integration was identified as an item for further NRC review during a future inspection. This inspection concluded that the applicant had successfully accomplished that integration.

The attachment to this report contains a partial list of the applicant personnel contacted.

Report Details

I. Inspection Scope

This inspection was the last in a series of three inspections conducted to support the review by the NRC office of Nuclear Reactor Regulation of the license renewal application for the Robinson plant. The purpose of this inspection was to follow up on actions taken by the applicant in response to open issues from the two previous inspections.

II. Findings

During a previous aging management programs inspection documented in NRC Inspection Report 05000261-03-09 the inspectors observed that the applicant had not yet established adequate tracking items in the established plant Action Request system data base to assure future implementation of proposed actions to support license renewal (LR), although the applicant had established a generally thorough task list data base within the LR group. The LR group task list needed to be integrated into the established plant Action Request system to ensure that future actions are accomplished as planned. The lack of integration of future tasks into the established site Action Request system had been previously identified via an applicant audit of the LR program. The Nuclear Assessment Section Assessment R-SP-03-01 identified the item as a weakness and gave it Action Request number (AR) 93272. Completion of this integration was identified as an item for further NRC review during a future inspection.

During this inspection the applicant provided the inspector a list of 47 license renewal commitments made to the NRC for future actions to support aging management programs (AMPs). This is the same list included in the NRC Safety Evaluation Report with open items. The list included AR numbers for each commitment which had been loaded into the applicants Passport computer system as Nuclear Task Management (NTM) items. To verify completeness the inspector selected 16 AMP enhancements discussed in the previous NRC report to compare to the applicant's list. Ten of the items were completely reflected in ARs but six required some extra effort to track additional minor subtasks of the commitment. Discussion with the applicant showed that the subtasks were contained in the calculation documents for each AMP but had not been clearly included in the AR. Although the ARs contained a typical statement "Calculation RNP-L/LR-0601 identifies activities credited for aging management" the inspector expressed concern as to whether this statement would cause plant staff in the future to perform a detailed review of the calculation. The applicant agreed to revise the AR statements to read "Review calculation RNP-L/LR-0601 for activities credited for aging management" which should cause a future reviewer to identify the subtasks not included in the text of the ARs. The inspector found this method acceptable.

Commitments 25, 26, and 27 specified that the AMPs for the applicant's Structures Monitoring, Dam Inspection, and ASME Section XI Subsection IWL Program would include trending of the results of concrete inspections based on aggressive ground water and lake water. Trending was specified in the calculations describing the first two AMPs but not the third. The applicant agreed to revise the calculation for the ASME Section XI Subsection IWL Program to require trending of inspection results.

Also, during the previous inspection the inspectors observed that the System Engineer's System Walkdown Procedure, TMM-104, Revision 12, contained no reference to the Boric Acid Corrosion Program Procedure, PLP-040, or directions for initiation of a work request when evidence of RCS leakage is identified. No action has yet been taken on this item but the calculation RNP-L/LR-0601, Boric Acid Corrosion Program contains a note stating that future action will be taken to link

these two procedures. The boric acid procedure is being revised and AR 74141 specifies this action will be complete by December 31, 2003.

The inspector reviewed the RNP License Renewal Transition Plan, approved August 27, 2003. The document describes plans to complete the license renewal project and transition responsibilities for future tasks to the plant engineering staff. Some commitments were designated as "near term" which are planned to be accomplished by the license renewal staff before they are reassigned in June 2004. Others are designated "transition" which are to be accomplished by the plant engineering staff prior to the period of extended operation beginning August 1, 2010. For transition items the license renewal staff will complete a transition package, to be reviewed and agreed to by the plant staff, describing in detail the future actions to be taken. The inspectors concluded that the transition plan is a good plan and should ensure that all license renewal commitments are met.

Exit Meeting Summary

The results of this inspection were discussed on September 10, 2003, with members of the CPL staff in an exit meeting at the Robinson site. The applicant acknowledged the findings presented and presented no dissenting comments.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Applicant

C. Baucom, Supervisor Licensing
C. Burton, Director Site Operations
T. Cleary, Plant General Manager
T. Clements, Manager License Renewal
R. Stewart, Supervisor License Renewal

NRC

R. Hagar, Senior Resident Inspector
D. Jones, Resident Inspector
S. Mitra, Senior Project Manager