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10 CFR 50.4

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ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

**Subject:** Third Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order No. EA-12-051)

**References:**

1. NRC Order EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679)
2. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Revision 0, dated August 29, 2012, (ADAMS Accession No. ML12221A339)
3. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, Revision 1, dated August 2012, (ADAMS Accession No. ML12240A307)
4. Duke Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 29, 2012, (ADAMS Accession No. ML12307A020)
5. Duke Energy Letter, *Carolina Power & Light Company's Overall Integrated Plans in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013, (ADAMS Accession No. ML13086A096)
6. Duke Energy Letter, *Carolina Power & Light Company, First Six-month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, Dated August 26, 2013, (ADAMS Accession No. ML13242A010)
7. NRC Letter, *H. B. Robinson Steam Electric Plant, Unit 2 –Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC NO. MF0793)*, Dated November 19, 2013, (ADAMS Accession No. ML13273A481)

ADD  
NRR

8. Duke Energy Letter, *Carolina Power & Light Company, Second Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order No. EA-12-051)*, Dated February 24, 2014, (ADAMS Accession No. ML14063A604)
9. NRC Letter, *Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Level Instrumentation Order EA-12-051*, Dated March 26, 2014, (ADAMS Accession No. ML14083A620)

Ladies and Gentlemen,

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order No. EA-12-051 (Reference 1) to Duke Energy Progress. Reference 1 was immediately effective and directs Duke Energy Progress to have a reliable indication of water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Duke Energy Progress initial status report regarding spent fuel pool instrumentation. Reference 5 provided the Duke Energy Progress Overall Integrated Plan (OIP).

Reference 1 required submission of a status report at six-month intervals following submittal of the OIP. Reference 3 provides direction regarding the content of the status reports. References 6 and Reference 8 provides the first and second six-month status report, respectively, for the H. B. Robinson Steam Electric Plant, Unit No. 2.

The purpose of this letter is to provide the third six-month status report pursuant to Section IV, Condition C.2, of Reference 1. The enclosed report provides an update since the last status report, including any updates of milestone accomplishments and any changes to the compliance method, schedule, or need for relief and the basis, if any.

By Letter dated November 19, 2013 (Reference 7), the NRC provided an Interim Staff Evaluation (ISE) which included a Request for Additional Information (RAI) to H. B. Robinson Steam Electric Plant, Unit No. 2. In accordance with Reference 9, NRC advised each licensee participating in the audit not to formally submit their RAI responses on the docket but instead, put their responses and any supporting information on their ePortals by the date identified in their ISE to support the staff's review process. Duke Energy's response to the H. B. Robinson RAI's is currently scheduled to be placed on the ePortal by September 30, 2014.

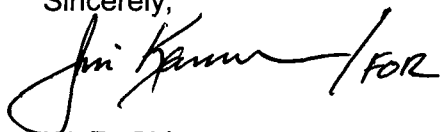
This letter contains no new Regulatory Commitments and no revision to existing Regulatory Commitments.

Should you have any questions regarding this submittal, please contact Mr. Richard Hightower, Manager, Nuclear Regulatory Affairs at (843) 857-1329.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/26/2014.

Sincerely,

A handwritten signature in black ink, appearing to read "W. R. Gideon" followed by a large flourish and the letters "FOR".

W. R. Gideon  
Site Vice President

WRG/shc

Enclosure: Third Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order No. EA-12-051)

cc: Ms. M. C. Barillas, NRC Project Manager, NRR  
Mr. K. M. Ellis, NRC Senior Resident Inspector  
Mr. V. M. McCree, NRC Region II Administrator

**ENCLOSURE**

**H. B. Robinson Steam Electric Plant, Unit No. 2**

**Docket No. 50-261**

**Renewed License No. DPR-23**

**Third Six-Month Status Report in Response to March 12, 2012,  
Commission Order Modifying Licenses with Regard to  
Reliable Spent Fuel Pool Instrumentation  
(Order No. EA-12-051)**

## **1 Introduction**

H. B. Robinson Steam Electric Plant, Unit No. 2 developed an Overall Integrated Plan (OIP) (Reference 1 in Section 8), documenting the requirements to install reliable spent fuel pool level instrumentation in response to NRC Order EA-12-051. The first six-month update was provided to the NRC on August 26, 2013 (Reference 2 in Section 8). The second six-month update was provided to the NRC on February 24, 2014 (Reference 8 in Section 8). This enclosure provides an update of milestone accomplishments since submittal of the second six-month update, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any, that occurred during the period from January 28, 2014 to July 28, 2014 (hereafter referred to as "the update period").

## **2 Milestone Accomplishments**

No new milestones were completed during the update period.

## **3 Milestone Schedule Status**

There are no changes to the schedule as reported in Reference 1 of Section 8.

## **4 Changes to Compliance Method**

No changes to the method of compliance were made during the update period.

## **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

H. B. Robinson Steam Electric Plant, Unit No. 2 expects to comply with the order implementation date and no relief/relaxation is required at this time.

## **6 Open Items from Overall Integrated Plan and Interim Staff Evaluation**

There are no open items documented in the OIP or in the Interim Staff Evaluation (ISE). The ISE received (Reference 7 in Section 8) included Request for Additional Information (RAI). Reference 9 instructs that responses to the RAI do not need to be formally submitted on the docket but instead to place the response in the H. B. Robinson Steam Electric Plant, Unit No. 2 ePortal. Duke Energy's responses to the H. B. Robinson RAI's is currently scheduled to be placed on the ePortal by September 30, 2014.

## **7 Potential Interim Staff Evaluation Impacts**

The NRC ISE for H. B. Robinson was provided by Reference 8 in Section 8. There are no potential impacts to the ISE identified at this time.

## 8 References

The following references support the updates to the OIP described in this enclosure:

1. Duke Energy Letter, *Carolina Power & Light Company's Overall Integrated Plans in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, Dated February 28, 2013, ADAMS Accession No. ML13086A095.
2. Duke Energy Letter, *Duke Energy Progress, Inc., First Six-month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, Dated August 26, 2013, ADAMS Accession No. ML13242A009.
3. NRC Order EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012, ADAMS Accession No. ML12054A679.
4. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Dated August 29, 2012, ADAMS Accession No. ML12221A339.
5. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"*, Revision 1, Dated August 2012, ADAMS Accession No. ML12240A307.
6. Duke Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent fuel Pool Instrumentation Order No. EA-12-051*, Dated October 29, 2012, ADAMS Accession No. ML12307A020.
7. NRC Letter, *H. B. Robinson Steam Electric Plant, Unit 2 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0793)* Dated November 19, 2013, ADAMS Accession No. ML13273A481.
8. Duke Energy Letter, *H. B. Robinson Steam Electric Plant, Unit No. 2, Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order EA-12-051)* Dated February 24, 2014, ADAMS Accession No. ML14063A604.
9. NRC Letter, *Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Level Instrumentation Order EA-12-051*, Dated March 26, 2014, ADAMS Accession No. ML14083A620.