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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

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

SUBJECT: 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 MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS (ORDER NUMBER EA-12-049)

REFERENCE:

1. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*
2. NRC Interim Staff Guidance JLD-ISG-2012-01, *Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Letter to NRC, *Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)*, dated February 24, 2012
4. NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 0, dated August 2012

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC). Reference 1 was immediately effective and directs CP&L and FPC to develop, implement, and maintain guidance and strategies to maintain or restore core cooling,

containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms CP&L and FPC have received Reference 2 and are in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for the following units as indicated below.

| Unit | Prior to startup from Refueling Outage (RFO) or By |
|---|---|
| Brunswick Steam Electric Plant, Unit Nos. 1 | B121 (Spring 2016) |
| Brunswick Steam Electric Plant, Unit Nos. 2 | B222 (Spring 2015) |
| Crystal River Unit 3 Nuclear Generating Plant | December 31, 2016 |
| Shearon Harris Nuclear Power Plant, Unit No. 1 | H119 (Spring 2015) |
| H. B. Robinson Steam Electric Plant, Unit No. 2 | R229 (Spring 2015) |

This letter contains no new regulatory commitments.

If you have any questions or require additional information, please contact Donna Alexander, Manager, Nuclear Regulatory Affairs, at (919) 546-5357.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on
October 29, 2012.

Sincerely,



Benjamin Waldrep
Vice President
Corporate Governance and Operations Support

DBM

cc: USNRC Region II, Regional Administrator
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
USNRC Resident Inspector – CR3
USNRC Resident Inspector – SHNPP, Unit No. 1
USNRC Resident Inspector – HBRSEP, Unit No. 2
USNRC Director, Office of Nuclear Reactor Regulation
F. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3
A. T. Billoch Colón, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2
Jessica A. Kratchman, NRR/JLD/PMB, NRC
Eric E. Bowman, NRR/DPR/PGCB, NRC