

February 1, 2000

Mr. J. S. Keenan, Vice President
Brunswick Steam Electric Plant
Carolina Power & Light Company
Post Office Box 10429
Southport, North Carolina 28461

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 - INSERVICE
INSPECTION PROGRAM - SECOND 10-YEAR INTERVAL - EVALUATION OF
REQUESTS FOR RELIEF NOS. RR-23 THROUGH RR-28 (TAC NOS. MA4869
AND MA4870)

Dear Mr. Keenan:

By letter dated February 19, 1999, you requested relief from the American Society of
Mechanical Engineers Boiler and Pressure Vessel Code (the Code) Section XI examination
requirements for the second 10-year interval of the inservice inspection program at the
Brunswick Steam Electric Plant, Units 1 and 2.

The NRC staff, with technical assistance from its contractor, the Idaho National Engineering and
Environmental Laboratory (INEEL), has reviewed the subject relief requests. Based on the
information provided in the relief requests, the staff concludes that, for all six of the requests, the
Code requirements are impractical for the subject welds and components. Relief is granted
pursuant to 10 CFR 50.55a(g)(6)(i) because the extent of your examinations provide reasonable
assurance of structural integrity.

Enclosure 1 contains the staff's evaluation. Enclosure 2 is a copy of the INEEL Technical Letter
Report.

Sincerely,

/RA/by Ronald W. Hernan for:

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management

Docket Nos. 50-324 and 50-325

Enclosures: As stated

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Brunswick Steam Electric Plant
Carolina Power & Light Company
Post Office Box 10429
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INSPECTION PROGRAM - SECOND 10-YEAR INTERVAL - EVALUATION OF
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By letter dated February 19, 1999, you requested relief from the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (the Code) Section XI examination requirements for the second 10-year interval of the inservice inspection program at the Brunswick Steam Electric Plant, Units 1 and 2.

The NRC staff, with technical assistance from its contractor, the Idaho National Engineering and Environmental Laboratory (INEEL), has reviewed the subject relief requests. Based on the information provided in the relief requests, the staff concludes that, for all six of the requests, the Code requirements are impractical for the subject welds and components. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) because the extent of your examinations provide reasonable assurance of structural integrity.

Enclosure 1 contains the staff's evaluation. Enclosure 2 is a copy of the INEEL Technical Letter Report.

Sincerely,

A handwritten signature in black ink that reads "Richard P. Correia for".

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management

Docket Nos. 50-324 and 50-325

Enclosures: As stated

cc w/encls: See next page



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUESTS FOR RELIEF NOS. RR-23 THROUGH RR-28

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

CAROLINA POWER & LIGHT COMPANY

DOCKET NUMBERS 50-325 AND 50-324

1.0 INTRODUCTION

Inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components is performed in accordance with Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code and applicable addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The Code of record for the Brunswick Steam Electric Plant, Units 1 and 2, second 10-year ISI interval is the 1980 Edition through Winter 1981 Addenda of Section XI of the ASME B&PV Code.

2.0 EVALUATION

By letter dated February 19, 1999, Carolina Power and Light (the licensee) submitted its Second 10-Year Interval ISI Inspection Program Plan Requests for Relief Nos. RR-23 through RR-28 for the Brunswick Steam Electric Plant, Units 1 and 2.

The Idaho National Engineering and Environmental Laboratory (INEEL) has evaluated the information provided by the licensee in support of its Second 10-Year Interval ISI Program Plan Requests for Relief Nos. RR-23 through RR-28 for Brunswick Steam Electric Plant, Units 1 and 2. Based on the results of the review, the staff adopts the contractor's conclusions and recommendations presented in the Technical Letter Report (TLR), Enclosure 2.

The information provided by the licensee in support of its alternative to the Code requirements has been evaluated and the basis for disposition is documented below.

Request for Relief No. RR-23:

ASME Code, Section XI, Examination Category B-D, Items B3.90 and B3.100, require 100% volumetric examination of Class 1 reactor vessel full penetration nozzle-to-vessel welds and nozzle inside radius sections.

Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code's volumetric examination requirement for the Class 1 reactor pressure vessel full penetration nozzle welds listed in a table in Section A of the contractor's TLR.

The nozzle geometries and the proximity of the subject welds to nearby components restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the nozzles and/or reactor pressure vessel. Imposition of this requirement would result in a significant burden on the licensee.

The licensee has examined a significant portion (50-89%) of the cumulative Code-required volume for these welds and inner radius sections. The examination volumes covered and the extent of similar components, materials, and service conditions encountered provide reasonable assurance of the structural integrity of these nozzle-to-vessel pressure-retaining welds. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

Request for Relief No. RR-24:

ASME, Section XI, Examination Category B-J, Items B9.11 and B9.31, require 100% surface and volumetric examination of circumferential and branch pipe connection welds NPS 4 or larger in Class 1 pressure-retaining piping.

Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code-required volumetric examination coverage for the following Class 1 pressure-retaining welds in piping listed in Section B of the contractor's TLR.

Geometries and piping configurations (branch connections, weldolets, elbows, and reducers) restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the piping. Imposition of this requirement would result in a significant burden on the licensee.

The licensee has examined 36-88% of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject welds. The examination volumes covered and the extent of similar components, materials, and service conditions encountered provide reasonable assurance of structural integrity of these piping welds. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

Request for Relief No. RR-25:

ASME, Section XI, Code Case N-408-3, Examination Category C-F-2, Item C5.51, requires 100% surface and volumetric examination of Class 2 pressure-retaining circumferential welds in carbon or low alloy steel piping.

Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric examination of the Class 2 pressure-retaining circumferential piping welds listed in Section C of the contractor's TLR.

Geometries and piping configurations (branch connections, flanges, elbows and reducers) restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the piping. Imposition of this requirement would result in a significant burden on the licensee.

The licensee has examined 35 to 89% of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject welds. The examination volumes covered and the extent of similar components, materials, and service conditions encountered provide reasonable assurance of the structural integrity of the subject piping welds. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

Request for Relief No. RR-26:

ASME Code, Section XI, Examination Category B-A, Items B1.12, B1.30, and B1.40, require 100% surface and/or volumetric examination, as defined by Figures IWB-2500-2, IWB-2500-4, and IWB-2500-5 of longitudinal shell welds, circumferential shell-to-flange welds, and circumferential head-to-flange welds in Class 1 reactor pressure vessels during each inspection interval.

Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code-required volumetric examination for the welds listed in Section D of the contractor's TLR.

Component configurations and/or physical obstructions restrict access and make 100% volumetric examination of the subject welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the reactor pressure vessel. Imposition of this requirement would result in a significant burden on the licensee.

The licensee has examined a significant portion (58-76%) of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required

surface examinations for the subject head-to-flange weld. The examination volume covered and the extent of similar components, materials, and service conditions encountered provide reasonable assurance of the structural integrity of these welds. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

Request for Relief No. RR-27:

ASME Code, Section XI, Examination Category B-F, Item B5.130, requires 100% volumetric and surface examination, as defined by Figure IWB-2500-8, of dissimilar metal butt welds NPS 4 or larger during each inspection interval.

Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code-required volumetric examination for dissimilar metal butt welds listed in Section E of the contractor's TLR.

Geometries and piping configurations (nozzle-to-pipe taper) restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the piping. Imposition of this requirement would result in a significant burden on the licensee.

The licensee examined a significant portion (50-87%) of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject welds. The examination volume covered and the extent of similar components, materials, and service conditions encountered provide reasonable assurance of structural integrity of these dissimilar metal welds. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

Request for Relief No. RR-28:

ASME Code, section XI, Examination Category C-B, Item C2.21, requires 100% surface and volumetric examination, as defined by Figure IWB-2500-4(a) or (b), of nozzle-to-shell (or head) welds during each inspection interval.

Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric examination for nozzle-to-shell (or head) welds listed in Section F of the contractor's TLR.

Nozzle configurations restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the nozzles and/or RHR Heat Exchanger. Imposition of this requirement would be a significant burden on the licensee.

The licensee has examined a significant portion (50-89%) of the cumulative Code-required volume for the subject welds. The examination volume covered and the extent of similar components, materials, and service conditions encountered provide reasonable assurance of structural integrity of the subject nozzle-to-shell (or head) welds. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

3.0 CONCLUSION

For Requests for Relief RR-23 through RR-28, the staff concludes that the Code requirements are impractical for the subject welds/components. The examinations the licensee performed provide reasonable assurance of structural integrity of the subject components. Relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

Principal Contributor: T. McLellan

Date: **February 1, 2000**

TECHNICAL LETTER REPORT
ON THE SECOND 10-YEAR INTERVAL INSERVICE INSPECTION
REQUESTS FOR RELIEF RR-23 THROUGH RR-28
FOR
CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NUMBERS 50-325 AND 50-324

1. INTRODUCTION

By letter dated February 19, 1999, the licensee, Carolina Power & Light Company, submitted Requests for Relief RR-23 through RR-28, seeking relief from the requirements of the ASME Code, Section XI, for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2, second 10-year inservice inspection (ISI) interval. The Idaho National Engineering and Environmental Laboratory (INEEL) staff's evaluation of the subject requests for relief is in the following section.

2. EVALUATION

The information provided by Carolina Power & Light Company in support of the requests for relief from Code requirements has been evaluated and the bases for disposition are documented below. The Code of record for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2, second 10-year ISI interval, which ended May 10, 1998 for both units, is the 1980 Edition through winter 1981 Addenda of Section XI of the ASME Boiler and Pressure Vessel Code.

A. Request for Relief No. RR-23, Examination Category B-D, Items B3.90 and B3.100, Examination Coverage of Class 1 Full Penetration Nozzle-to-Vessel Welds

Code Requirement: Examination Category B-D, Items B3.90 and B3.100, require 100% volumetric examination of Class 1 reactor vessel full penetration nozzle-to-vessel welds and nozzle inside radius sections. Code Case N-460, *Alternative Examination Coverage for Class 1 and Class 2 Welds*, states that when the entire examination volume or area cannot be examined due to interference by another component or part geometry, a reduction in examination coverage of less than 10% is permissible.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code's volumetric examination requirement for the Class 1 reactor pressure vessel full penetration nozzle welds listed in the following table.

System	Component	Item No.	Coverage %	Limitation
RPV	1B11-RPV-N10	B3.90	50	Geometry
RPV	1B11-RPV-N11A	B3.90	52	Geometry, interference from adjacent nozzles
RPV	1B11-RPV-N11B	B3.90	52	Geometry, interference from adjacent nozzles
RPV	1B11-RPV-N-12A	B3.90	69	Geometry
RPV	1B11-RPV-N-12B	B3.90	50	Geometry
RPV	1B11-RPV-N16A	B3.90	61	Geometry
RPV	1B11-RPV-N16B	B3.90	61	Geometry
RPV	1B11-RPV-N1A	B3.90	50	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N1B	B3.90	67	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2A	B3.90	65	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2B	B3.90	65	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2C	B3.90	63	Interference from support brackets
RPV	1B11-RPV-N2D	B3.90	65	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	1B11-RPV-N2E	B3.90	65	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	1B11-RPV-N2F	B3.90	69	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2G	B3.90	65	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2H	B3.90	63	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2J	B3.90	65	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N2K	B3.90	69	Nozzle configuration, interference from support brackets
RPV	1B11-RPV-N3A	B3.90	66	Geometry
RPV	1B11-RPV-N3B	B3.90	66	Geometry
RPV	1B11-RPV-N3C	B3.90	66	Geometry

System	Component	Item No.	Coverage %	Limitation
RPV	1B11-RPV-N3D	B3.90	66	Geometry
RPV	1B11-RPV-N4A	B3.90	63	Nozzle geometry and proximity to adjacent nozzle
RPV	1B11-RPV-N4B	B3.90	64	Nozzle geometry and proximity to adjacent nozzle
RPV	1B11-RPV-N4C	B3.90	63	Nozzle geometry and proximity to adjacent nozzle
RPV	1B11-RPV-N4D	B3.90	67	Nozzle geometry and proximity to adjacent nozzle
RPV	1B11-RPV-N5A	B3.90	62	Geometry
RPV	1B11-RPV-N5B	B3.90	68	Geometry
RPV	1B11-RPV-N6A	B3.90	70	Geometry
RPV	1B11-RPV-N6B	B3.90	70	Geometry
RPV	1B11-RPV-N7	B3.90	70	Geometry
RPV	1B11-RPV-N8A	B3.90	64	Geometry
RPV	1B11-RPV-N8B	B3.90	64	Geometry
RPV	1B11-RPV-N9	B3.90	50	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N10	B3.90	50	Nozzle configuration
RPV	2B11-RPV-N11A	B3.90	57	Proximity to adjacent nozzle
RPV	2B11-RPV-N11B	B3.90	57	Proximity to adjacent nozzle
RPV	2B11-RPV-N12A	B3.90	69	Geometry
RPV	2B11-RPV-N12B	B3.90	69	Geometry
RPV	2B11-RPV-N16A	B3.90	61	Geometry
RPV	2B11-RPV-N16B	B3.90	61	Geometry
RPV	2B11-RPV-N1A	B3.90	50	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N1B	B3.90	67	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N2A	B3.90	63	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N2B	B3.90	62	Nozzle geometry and proximity to adjacent nozzle

System	Component	Item No.	Coverage %	Limitation
RPV	2B11-RPV-N2C	B3.90	63	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N2D	B3.90	63	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N2E	B3.90	63	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N2F	B3.90	63	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N2G	B3.90	62	Nozzle configuration, interference from support brackets
RPV	2B11-RPV-N2H	B3.90	62	Nozzle configuration, interference from support brackets
RPV	2B11-RPV-N2J	B3.90	56	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N2K	B3.90	63	Nozzle configuration, interference from support brackets and adjacent nozzle
RPV	2B11-RPV-N3A	B3.90	66	Geometry
RPV	2B11-RPV-N3B	B3.90	66	Geometry
RPV	2B11-RPV-N3C	B3.90	66	Geometry
RPV	2B11-RPV-N3D	B3.90	66	Geometry
RPV	2B11-RPV-N4A	B3.90	61	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N4B	B3.90	65	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N4C	B3.90	61	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N4D	B3.90	65	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N5A	B3.90	62	Geometry
RPV	2B11-RPV-N5B	B3.90	62	Geometry
RPV	2B11-RPV-N6A	B3.90	70	Geometry
RPV	2B11-RPV-N6B	B3.90	70	Geometry
RPV	2B11-RPV-N7	B3.90	70	Geometry
RPV	2B11-RPV-N8A	B3.90	62	Geometry
RPV	2B11-RPV-N8B	B3.90	62	Geometry

System	Component	Item No.	Coverage %	Limitation
RPV	2B11-RPV-N9	B3.90	60	Nozzle geometry and proximity to adjacent nozzle
RPV	2B11-RPV-N11A-IRS	B3.100	89	Proximity to adjacent nozzle
RPV	2B11-RPV-N11B-IRS	B3.100	89	Proximity to adjacent nozzle
RPV	2B11-RPV-N2B-IRS	B3.100	89	Nozzle geometry and proximity to adjacent nozzle

Licensee's Basis for Requesting Relief (as stated):

"Section XI of ASME Code was issued January 1, 1970. At the time of issuance, the design of BSEP, Units 1 and 2, was at a stage where literal compliance with the access requirements outlined in the ASME Code, Section XI was not possible. For this reason, limitations associated with the components listed in Table 1 prevented CP&L from obtaining the required examination coverage specified in ASME Code Case N-460. In order to obtain required examination coverage, CP&L would have to implement major design modifications.

"Paragraph (g)(4) of 10 CFR 50.55a, Codes and Standards, requires that Class 1 components meet the requirements set forth in the ASME Code, Section XI incorporated by reference in paragraph (b), to the extent practical, within the limitation of design, geometry, and material of construction of the components. Since it was recognized that some plants, such as BSEP, were built before some of the ASME Standards were written, the above provisions outlined in 10 CFR 50.55a(g)(4) were written to address this situation.

"CP&L has determined that performing the alternative examination requirements specified in ASME Code Case N-460, to the maximum extent practical, on the components identified in Table 1 will provide an acceptable level of quality and safety for the following reasons:

- "1. The extent of the nozzle welds not examined represents a small percentage of the total length of welds examined in accordance with the Examination Category B-D. Thus, CP&L believes that generic degradation of components within this Examination Category would have been detected.
- "2. In addition to the examination specified in Examination Category B-D, CP&L performed a pressure test of the components listed in Table 1 each refueling outage in accordance with Examination Category B-P. The successful completion of these pressure tests provided assurance of the component's structural integrity.
- "3. In accordance with 10 CFR 50.55a(g)(4), CP&L examined the components listed in Table 1, to the maximum extent practical, during the Second Inspection Interval."

Licensee's Proposed Alternative Examination (as stated):

"None."

Evaluation: Examination Category B-D, Items B3.90 and B3.100, require 100% volumetric examination of Class 1 reactor vessel full penetration nozzle-to-vessel welds and nozzle inside radius sections. However, as explained in the licensee's submittal and as described by the licensee during a conference call on November 23, 1999, typical nozzle geometries and proximity to nearby components restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the nozzles and/or reactor pressure vessel. Imposition of this requirement would result in a considerable burden on the licensee.

The licensee has examined a significant portion (50-89%) of the cumulative Code-required volume for these welds and inner radius sections. Given the examination volumes covered and the extent of similar components, materials, and service conditions encountered, significant patterns of degradation would have been detected by the examinations that were completed. Therefore, it is concluded that the examinations provide reasonable assurance of the structural integrity of these nozzle-to-vessel pressure-retaining welds.

Based on the impracticality of meeting the Code requirements for the subject welds, and the reasonable assurance provided by the examinations that were completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

B. Request for Relief No. RR-24, Examination Category B-J, Items B9.11 and B9.31, Examination Coverage for Pressure-retaining Welds in Class 1 Piping

Code Requirement: Examination Category B-J, Items B9.11 and B9.31, require 100% surface and volumetric examination of circumferential and branch pipe connection welds NPS 4 or larger in Class 1 pressure-retaining piping.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code-required volumetric¹ examination coverage for the following Class 1 pressure-retaining welds in piping.

System	Component	Item No.	Coverage %	Limitation
CS	1E213-1-3-FWCSA6	B9.11	88	Geometry, valve to elbow configuration
CS	1E217-3-7FWCSB3	B9.11	81	Geometry, pipe to valve configuration
CS	1E21FF-8-FW1CS17	B9.11	64	Geometry, valve to elbow configuration

1 The licensee clarified during the conference call on November 23, 1999, that Relief Request RR-24 is for volumetric examinations only. Surface examinations were completed as required by the Code.

System	Component	Item No.	Coverage %	Limitation
RCR	1B32RECIRC-22-AM-4	B9.11	50	Geometry, pipe to cross configuration
RCR	1B32RECIRC-28-A-16	B9.11	60	Geometry, pipe to reducing tee configuration
RCR	1B32RECIRC-28-A-6	B9.11	54	Geometry, reducing tee to pipe configuration
RCR	1B32RECIRC-28-B-9	B9.11	36	Geometry, valve to pipe configuration
RHR	1E1184-3-84-FWRHRA3	B9.11	86	Geometry, elbow to pipe bend configuration
RCR	1B32RECIRC-28-A-9BC-1	B9.11	55	Geometry, weldolet to pipe configuration
RCR	1B32RECIRC-22-BM-3BC	B9.11	63	Geometry, pipe to sweeplet configuration
CS	2E213-2-3-FWW5	B9.11	74	Geometry, pipe to valve configuration
MS	2B21PS1A3-24-SWJ	B9.11	50	Geometry, and interference from whip restraint
MS	2B21PS1A5-24-FWA6	B9.11	75	Geometry, valve to pipe configuration
MS	2B21PS1D5-24-SWA	B9.11	50	Geometry, pipe to elbow configuration
RCR	2B32FF-12-FWRRRA10A	B9.11	68	Geometry, sweeplet to pipe configuration
RCR	2B32FF-12-FWRRRA13A	B9.11	36	Geometry, sweeplet to pipe configuration
RCR	2B32FFRECIRC-22-BM-2	B9.11	50	Geometry, header to cross configuration
RCR	2B32RECIRC-28-B-14	B9.11	50	Geometry, valve to elbow configuration
RCR	2B32RECIRC-28-B-9	B9.11	80	Geometry, valve to pipe configuration
RCR	2B32RECIRC-4-A-6	B9.11	50	Geometry, pipe to flange configuration
RCR	2B32RECIRC-28-B-6	B9.11	50	Geometry, pipe to flange configuration
RCR	2B32RECIRC-28-B-7	B9.11	50	Geometry, tee to valve configuration
RHR	2E1184-3-84-FWR4	B9.11	64	Geometry, pipe bend to elbow configuration
RWC	2G3114-1-14-FW1954A	B9.11	75	Geometry, valve to pipe configuration
RCR	2B32RECIRC-28-A-12BC	B9.31	49	Geometry, pipe to weldolet configuration

Licensee's Basis for Requesting Relief (as stated):

"Section XI of ASME Code was issued January 1, 1970. At the time of issuance, the design of BSEP, Units 1 and 2, was at a stage where literal compliance with the access requirements outlined in the ASME Code, Section XI was not possible. For this reason, limitations associated with the components listed in Table 1 prevented CP&L from

obtaining the required examination coverage specified in ASME Code Case N-460. In order to obtain required examination coverage, CP&L would have to implement major design modifications.

"Paragraph (g)(4) of 10 CFR 50.55a, Codes and Standards, requires that Class 1 components meet the requirements set forth in the ASME Code, Section XI incorporated by reference in paragraph (b), to the extent practical, within the limitation of design, geometry, and material of construction of the components. Since it was recognized that some plants, such as BSEP, were built before some of the ASME Standards were written, the above provisions outlined in 10 CFR 50.55a(g)(4) were written to address this situation.

"CP&L has determined that performance of the alternative examination requirements specified in ASME Code Case N-460, to the maximum extent practical, on the components identified in Table 1 provides an acceptable level of quality and safety for the following reasons:

- "1. The extent of the welds not examined represents a small percentage of the total length of welds examined in accordance with Examination Category B-J. Thus, CP&L is confident that generic degradation of components within this Examination Category would have been detected.
- "2. In addition to the examination specified in Examination Category B-J, CP&L performed a pressure test of the components listed in Table 1 each refueling outage in accordance with Examination Category B-P. The successful completion of these pressure tests provided assurance of the component's structural integrity.
- "3. In accordance with 10 CFR 50.55a(g)(4), CP&L examined the components listed in Table 1, to the maximum extent practical, during the Second Inspection Interval."

Licensee's Proposed Alternative Examination (as stated):

"None."

Evaluation: Examination Category B-J, Items B9.11 and B9.31, require 100% surface and volumetric examination of circumferential and branch pipe connection welds NPS 4 or larger in Class 1 pressure-retaining piping. However, as explained in the licensee's submittal and as described by the licensee during the November 23, 1999, conference call, typical geometries and piping configurations (branch connections, weldolets, elbows, and reducers) restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the piping. Imposition of this requirement would result in a considerable burden on the licensee.

The licensee has examined 36-88% of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject welds. Given the examination volumes covered and the extent of similar

components, materials, and service conditions encountered, significant patterns of degradation would have been detected by the examinations that were completed. Therefore, it is concluded that the examinations provide reasonable assurance of the structural integrity of these piping welds.

Based on the impracticality of meeting the Code requirements for the subject welds, and the reasonable assurance provided by the examinations that were completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

C. Request for Relief No. RR-25, Examination Category C-F-2, Item C5.51, Examination Coverage for Class 2 Pressure-Retaining Circumferential Welds in Piping Code Requirement:

Code Case N-408-3,² Examination Category C-F-2, Item C5.51, requires 100% surface and volumetric examination of Class 2 pressure-retaining circumferential welds in carbon or low alloy steel piping.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric³ examination of the Class 2 pressure-retaining circumferential piping welds listed in the following table.

System	Component	Item No.	Coverage %	Limitation
CS	1E216-39-SWC	C5.51	70	Geometry, tee-to-flange configuration
RHR	1E11106-13-FW150	C5.51	35	Geometry, pump-to-elbow configuration
RHR	1E1144-15-SWA	C5.51	89	Geometry, elbow-to-pipe configuration
RHR	1E1146-15-FW60-2	C5.51	73	Geometry, reducing tee-to-flange configuration
RHR	2E1138-109-FW48D	C5.51	75	Geometry, pipe-to-reducing flange configuration
RHR	2E114-155-FW5	C5.51	83	Geometry, pipe-to-reducing tee configuration

Licensee's Basis for Requesting Relief (as stated):

2 The Licensee verified during a conference call on November 2, 1999 that Code Case N-408-3 was being used.

3 The Licensee clarified during the conference call on November 23, 1999, that Relief Request RR-25 is for volumetric examinations only. Surface examinations were completed as required by the Code.

"Section XI of the ASME Code was issued January 1, 1970. At the time of issuance, the design of BSEP, Units 1 and 2, was at a stage where literal compliance with the access requirements outlined in the ASME Code, Section XI was not possible. For this reason, limitations associated with the components listed in Table 1 prevented CP&L from obtaining the required examination coverage specified in ASME Code Case N-460. In order to obtain required examination coverage, CP&L would have to implement major design modifications.

"Paragraph (g)(4) of 10 CFR 50.55a, Codes and Standards, requires that Class 2 components meet the requirements set forth in the ASME Code, Section XI incorporated by reference in paragraph (b), to the extent practical, within the limitation of design, geometry, and material of construction of the components. Since it was recognized that some plants, such as BSEP, were built before some of the ASME Standards were written, the above provisions outlined in 10 CFR 50.55a(g)(4) were written to address this situation.

"CP&L has determined that performance of the alternative examination requirements specified in ASME Code Case N-460, to the maximum extent practical, on the components identified in Table 1 provides an acceptable level of quality and safety for the following reasons:

- "1. The extent of the welds not examined represents a small percentage of the total length of welds examined in accordance with Examination Category C-F-2. Thus, CP&L is confident that generic degradation of components within this Examination Category would have been detected.
- "2. In addition to the examination specified in Examination Category C-F-2, CP&L performed a pressure test of the components listed in Table 1 each Inspection Period in accordance with Examination Category C-H. The successful completion of these pressure tests provided assurance of the component's structural integrity.
- "3. In accordance with 10 CFR 50.55a(g)(4), CP&L examined the components listed in Table 1, to the maximum extent practical, during the Second Inspection Interval."

Licensee's Proposed Alternative Examination (as stated):

"None."

Evaluation: Code Case N-408-3, *Alternative Rules for Examination of Class 2 Piping*, Examination Category C-F-2, Item C5.51, requires 100% surface and volumetric examination of Class 2 pressure-retaining circumferential welds in carbon or low alloy steel piping. However, as explained in the licensee's submittal and as described by the licensee during a conference call on November 23, 1999, typical geometries and piping configurations (branch connections, flanges, elbows and reducers) restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the piping. Imposition of this requirement would result in a considerable burden on the licensee.

The licensee has examined 35 to 89% of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject welds. Given the examination volumes covered and the extent of similar components, materials, and service conditions encountered, significant patterns of degradation would have been detected by the examinations that were completed. Therefore, it is concluded that the examinations provide reasonable assurance of the structural integrity of these piping welds.

Based on the impracticality of meeting the Code requirements for the subject welds, and the reasonable assurance provided by the examinations that were completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

D. Request for Relief No. RR-26, Examination Category B-A, Item B1.30, Class 1, Shell-to-flange Welds and Item B1.40, Class 1, Head-to-Flange Welds and Item B1.12, Class 1, Longitudinal Shell Welds

Code Requirement: Examination Category B-A, Items B1.12, B1.30, and B1.40, require 100% surface and/or volumetric examination, as defined by Figures IWB-2500-2, IWB-2500-4, and IWB-2500-5, of longitudinal shell welds, circumferential shell-to-flange welds, and circumferential head-to-flange welds in Class 1 reactor pressure vessels during each inspection interval.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code-required volumetric⁴ examination for the welds in the following table.

System	Component	Item No.	Coverage %	Limitation
RPV	1B11-RPV-F1 & F2	B1.30	58	Physical obstructions and/or component configuration
RPV	1B11-RPV-C1, C2, & C3	B1.40	73	Physical obstructions and/or component configuration
RPV	2B11-RPV-E4A	B1.12	76	Physical obstructions and/or component configuration
RPV	2B11-RPV-F1 & F2	B1.30	58	Physical obstructions and/or component configuration
RPV	2B11-RPV-C1, C2, & C3	B1.40	68	Physical obstructions and/or component configuration

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The Licensee clarified during the conference call on November 23, 1999 that Relief Request RR-26 is for volumetric examinations only. Surface examinations were completed as required by the Code.

Licensee's Basis for Requesting Relief (as stated):

"Section XI of the ASME Code was issued January 1, 1970. At the time of issuance, the design of BSEP, Units 1 and 2, was at a stage where literal compliance with the access requirements outlined in the ASME Code, Section XI was not possible. For this reason, limitations associated with the components listed in Table 1 prevented CP&L from obtaining the required examination coverage specified in ASME Code Case N-460. In order to obtain the required examination coverage, CP&L would have to implement major design modifications.

"Paragraph (g)(4) of 10 CFR 50.55a, Codes and Standards, requires that Class 1 components meet the requirements set forth in the ASME Code, Section XI incorporated by reference in paragraph (b), to the extent practical, within the limitation of design, geometry, and material of construction of the components. Since it was recognized that some plants, such as BSEP, were built before some of the ASME Standards were written, the above provisions outlined in 10 CFR 50.55a(g)(4) were written to address this situation.

"CP&L has determined that performance of the alternative examination requirements specified in ASME Code Case N-460, to the maximum extent practical, on the components identified in Table 1 provides an acceptable level of quality and safety for the following reasons:

- "1. The extent of the welds not examined represents a small percentage of the total length of welds examined in accordance with Examination Category B-A. Thus, CP&L is confident that generic degradation of components within this Examination Category would have been detected.
- "2. In addition to the examination specified in Examination Category B-A, CP&L performed a pressure test of the components listed in Table 1 each Inspection Period in accordance with Examination Category B-P. The successful completion of these pressure tests provided assurance of the component's structural integrity.
- "3. In accordance with 10 CFR 50.55a(g)(4), CP&L examined the components listed in Table 1, to the maximum extent practical, during the Second Inspection Interval."

Licensee's Proposed Alternative Examination (as stated):

"None."

Evaluation: Examination Category B-A, Items B1.12, B1.30 and B1.40, require 100% surface and/or volumetric examination, as defined by Figures IWB-2500-2, IWB-2500-4 and IWB-2500-5, of longitudinal shell welds, circumferential shell-to-flange welds, and circumferential head-to-flange welds in Class 1 reactor pressure vessels during each inspection interval. However, as described by the licensee during the November 23, 1999, conference call, typical component configurations and/or physical obstructions restrict access and make 100% volumetric examination of the subject welds impractical. To

complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the reactor pressure vessel. Imposition of this requirement would result in a considerable burden on the licensee.

The licensee has examined a significant portion (58-76%) of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject head-to-flange weld. Given the examination volume covered and the extent of similar components, materials, and service conditions encountered, significant patterns of degradation would have been detected by the examinations that were completed. Therefore, it is concluded that the examinations provide reasonable assurance of the structural integrity of the head-to-flange weld.

Based on the impracticality of meeting the Code requirements for the subject welds, and the reasonable assurance provided by the examinations that were completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

E. Request for Relief No. RR-27, Examination Category B-F, Item B5.130, Class 1, Nominal Pipe Size (NPS) 4 or Larger Dissimilar Metal Butt Welds

Code Requirement: Examination Category B-F, Item B5.130, requires 100% volumetric and surface examination, as defined by Figure IWB-2500-8, of dissimilar metal butt welds NPS 4 or larger during each inspection interval.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from the Code-required volumetric⁵ examination for dissimilar metal butt welds listed in the following table.

System	Component	Item No.	Coverage %	Limitation
RHR	1B32RD2B2-84-FWB33	B5.130	76	Geometry
RWC	1G3115-1-15-FWRWCUB2A	B5.130	87	Geometry
RHR	2B32RDIA2-87-FWA33	B5.130	50	Geometry
RHR	2G3114-1-14-FWI949A	B5.130	75	Geometry

Licensee's Basis for Requesting Relief (as stated):

"Section XI of the ASME Code was issued January 1, 1970. At the time of issuance, the design of BSEP, Units 1 and 2, was at a stage where literal compliance with the access requirements outlined in the ASME Code, Section XI was not possible. For this reason, limitations associated with the components listed in Table 1 prevented CP&L from

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The Licensee clarified during the conference call on November 23, 1999, that Relief Request RR-27 is for volumetric examinations only. Surface examinations were completed as required by the Code.

obtaining the required examination coverage specified in ASME Code Case N-460. In order to obtain the required examination coverage, CP&L would have to implement major design modifications.

"Paragraph (g)(4) of 10 CFR50.55a, Codes and Standards, requires that Class 1 components meet the requirements set forth in the ASME Code, Section XI incorporated by reference in paragraph (b), to the extent practical, within the limitation of design, geometry, and material of construction of the components. Since it was recognized that some plants, such as BSEP, were built before some of the ASME Standards were written, the above provisions outlined in 10 CFR 50.55a(g)(4) were written to address this situation.

"CP&L has determined that performance of the alternative examination requirements specified in ASME Code Case N-460, to the maximum extent practical, on the components identified in Table 1 provides an acceptable level of quality and safety for the following reasons:

- "1. The extent of the welds not examined represents a small percentage of the total length of welds examined in accordance with Examination Category B-F. Thus, CP&L is confident that generic degradation of components within this Examination Category would have been detected.
- "2. In addition to the examination specified in Examination Category B-F, CP&L performed a pressure test of the components listed in Table 1 each Inspection Period in accordance with Examination Category B-P. The successful completion of these pressure tests provided assurance of the component's structural integrity.
- "3. In accordance with 10 CFR 50.55a(g)(4), CP&L examined the components listed in Table 1, to the maximum extent practical, during the Second Inspection Interval."

Licensee's Proposed Alternative Examination (as stated):

"None."

Evaluation: Examination Category B-F, Item B5.130, requires 100% volumetric and surface examination, as defined by Figure IWB-2500-8, of NPS 4 or larger dissimilar metal butt welds during each inspection interval. However, as explained in the licensee's submittal and as described by the licensee during the November 23, 1999, conference call, typical geometries and piping configurations (nozzle-to-pipe taper) restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the piping. Imposition of this requirement would result in a considerable burden on the licensee.

The licensee examined a significant portion (50-87%) of the cumulative Code-required volume for the subject welds. The licensee has also completed 100% of the Code-required surface examinations for the subject welds. Given the examination volume covered and the extent of similar components, materials, and service conditions encountered, significant

patterns of degradation would have been detected by the examinations that were completed. Therefore, it is concluded that the examinations provide reasonable assurance of the structural integrity of these dissimilar metal welds.

Based on the impracticality of meeting the Code requirements for the subject welds, and the reasonable assurance provided by the examinations that were completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

F. Request for Relief No. RR-28, Examination Category C-B, Item C2.21, Class 2 Nozzle-to-Shell (or Head) Welds

Code Requirement: Examination Category C-B, Item C2.21, requires 100% surface and volumetric examination, as defined by Figure IWB-2500-4(a) or (b), of nozzle-to-shell (or head) welds during each inspection interval.

Licensee's Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric⁶ examination for nozzle-to-shell (or head) welds listed in the following table.

System	Component	Item No.	Coverage %	Limitation
RHR	1E11HX-1A-SWN3	C2.21	62	Geometry of the RHR Heat Exchanger-to-nozzle configuration
RHR	1E11HX-1A-SWN4	C2.21	50	Geometry of the RHR Heat Exchanger-to-nozzle configuration
RHR	2E11HX-1A-SWN3	C2.21	55	Geometry of the RHR Heat Exchanger-to-nozzle configuration
RHR	2E11HX-1A-SWN4	C2.21	50	Geometry of the RHR Heat Exchanger-to-nozzle configuration

Licensee's Basis for Requesting Relief (as stated):

"Section XI of the ASME Code was issued January 1, 1970. At the time of issuance, the design of BSEP, Units 1 and 2, was at a stage where literal compliance with the access requirements outlined in the ASME Code, Section XI was not possible. For this reason, limitations associated with the components listed in Table 1 prevented CP&L from obtaining the required examination coverage specified in ASME Code Case N-460. In order to obtain the required examination coverage, CP&L would have to implement major design modifications.

⁶ The Licensee clarified during the conference call on November 23, 1999, that Relief Request RR-28 is for volumetric examinations only. Surface examinations were completed as required by the Code.

"Paragraph (g)(4) of 10 CFR50.55a, Codes and Standards, requires that Class 2 components meet the requirements set forth in the ASME Code, Section XI incorporated by reference in paragraph (b), to the extent practical, within the limitation of design, geometry, and material of construction of the components. Since it was recognized that some plants, such as BSEP, were built before some of the ASME Standards were written, the above provisions outlined in 10 CFR 50.55a(g)(4) were written to address this situation.

"CP&L has determined that performance of the alternative examination requirements specified in ASME Code Case N-460, to the maximum extent practical, on the components identified in Table 1 provides an acceptable level of quality and safety for the following reasons:

- "1. The extent of the welds not examined represents a small percentage of the total length of welds examined in accordance with Examination Category C-B. Thus, CP&L is confident that generic degradation of components within this Examination Category would have been detected.
- "2. In addition to the examination specified in Examination Category C-B, CP&L performed a pressure test of the components listed in Table 1 each Inspection Period in accordance with Examination Category C-H. The successful completion of these pressure tests provided assurance of the component's structural integrity.
- "3. In accordance with 10 CFR 50.55a(g)(4), CP&L examined the components listed in Table 1, to the maximum extent practical, during the Second Inspection Interval."

Licensee's Proposed Alternative Examination (as stated):

"None."

Evaluation: Examination Category C-B, Item C2.21, requires 100% surface and volumetric examination, as defined by Figure IWB-2500-4(a) or (b), of nozzle-to-shell (or head) welds during each inspection interval. However, as explained in the licensee's submittal and as described by the licensee during a conference call on November 23, 1999, typical nozzle configurations restrict access and make 100% volumetric examination of these welds impractical. To complete the examinations to the extent required by the Code, the licensee would have to redesign and modify the nozzles and/or RHR Heat Exchanger. Imposition of this requirement would result in a considerable burden on the licensee.

The licensee has examined a significant portion (50-89%) of the cumulative Code-required volume for the subject welds. Given the examination volume covered and the extent of similar components, materials, and service conditions encountered, significant patterns of degradation would have been detected by the examinations that were completed. Therefore, it is concluded that the examinations provide reasonable assurance of the structural integrity of these nozzle-to-shell (or head) welds.

Based on the impracticality of meeting the Code requirements for the subject welds, and the reasonable assurance provided by the examinations that were completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

3. CONCLUSION

The INEEL staff has evaluated the licensee's submittal and concludes that certain inservice examinations could not be performed to the extent required by the Code at the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. For Requests for Relief RR-23 through RR-28 it is concluded that the Code requirements are impractical for the subject welds/components. Therefore, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

It should be noted that while the Staff recommends that Requests for Relief RR-23 through RR-28 be granted, the licensee's submittal provided minimal information on limitations associated with the subject welds/components. This led to a Request for Additional Information (RAI) being submitted to the licensee. Due to the large number of welds/components requiring relief, the licensee stated that a response to the RAI would not be produced until the summer of 2000. In order to expedite the evaluation, the Staff elected to seek the necessary clarification/information via the use of teleconferencing with the licensee. While the staff was able to obtain general information from the licensee through the use of these conference calls, acquisition of specific details for each limitation was not possible. Therefore, the evaluations included in this report assume the limitations to be typical to those experienced by other licensees on similar welds/components.

Further, while the Regulations permit the licensee to defer notifying the Staff of limited inservice examinations, based on impracticality, until the end of an interval, standard industry practice is to submit these requests for relief at the time they are encountered throughout the interval. This practice allows the NRC to evaluate the particular circumstances or special conditions surrounding a licensee's basis for impracticality, and to apply alternative examinations, as applicable. Requests included in the licensee's current submittal do not conform to this standard industry practice.

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