



Cornelius J. Gannon
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Progress Energy Carolinas, Inc.

June 1, 2005

SERIAL: BSEP 05-0065

10 CFR 54

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324/License Nos. DPR-71 and DPR-62
Further Response to License Renewal Severe Accident Mitigation
Alternatives Request for Additional Information SAMA1-8
(NRC TAC Nos. MC4641 and MC4642)

- References:
1. Letter from Cornelius J. Gannon to the U. S. Nuclear Regulatory Commission (Serial: BSEP 04-0006), "Application for Renewal of Operating Licenses," dated October 18, 2004 (ML043060406)
 2. Letter from Richard L. Emch Jr., to Cornelius J. Gannon, "Request for Additional Information (RAI) Regarding Severe Accident Mitigation Alternatives for the Brunswick Steam Electric Plant, Units 1 and 2," dated February 24, 2005 (ML050550262)
 3. Letter from Cornelius J. Gannon to the U. S. Nuclear Regulatory Commission (Serial: BSEP 05-0051), "Response to Request for Additional Information - License Renewal," dated April 21, 2005 (ML051170260)

Ladies and Gentlemen:

On October 18, 2004, Carolina Power & Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), requested the renewal of the operating licenses for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, to extend the terms of their operating licenses an additional 20 years beyond the current expiration dates.

On February 24, 2005, the NRC issued a request for additional information (RAI) concerning the analysis of Severe Accident Mitigation Alternatives (SAMAs) performed in support of the BSEP License Renewal Application. By letter dated April 21, 2005, PEC provided responses to the SAMA RAIs. One of the NRC RAIs, RAI SAMA1-8, provides information about PEC's plans to further evaluate SAMAs that are potentially cost-

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beneficial. The response stated that an assessment will be performed to make recommendations based upon further evaluations of the potentially cost-beneficial SAMAs. However, the assessment would focus on Phase II SAMA 1 and on those baseline case SAMAs (i.e., SAMAs 15, 25, and 29) that would remain cost-beneficial if SAMA 1 were implemented.

In discussions with the NRC, it has been noted that SAMAs, other than those in the baseline case, may become cost-beneficial when uncertainties are considered. Specifically, these are SAMAs 6, 16, 17, 18, 30, 31, 32, and 34. PEC will include these SAMAs in the assessment that will make recommendations for the further evaluations of SAMAs. Completion of the evaluations is being tracked in the BSEP action tracking system. Decisions about possible implementation of the SAMAs will not be made upon probabilistic risk benefits and cost alone. Such decisions will also involve, in part, engineering judgment, and management judgment regarding operational and administrative burdens, practicality, and best use of scarce capital resources, and similar considerations.

Please refer any questions regarding this submittal to Mr. Mike Heath, Supervisor - License Renewal, at (910) 457-3487.

I declare, under penalty of perjury, that the foregoing is true and correct.
Executed on June 1, 2005.

Sincerely,



Cornelius J. Gannon

MHF/mhf

cc:

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