



Progress Energy

NOV 22 2005

SERIAL: BSEP 05-0143

U.S. Nuclear Regulatory Commission
ATTN: Chief, Rules and Directives Branch
Division of Administrative Services, Office of Administration
Mail Stop T-6D 59
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
Comments on Draft NUREG-1437, Supplement 25
Regarding Brunswick License Renewal
(NRC TAC Nos. MC4639 and MC4640)

Reference: 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)

Ladies and Gentlemen:

On October 18, 2004, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requested the renewal of the operating licenses for 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 September 7, 2005, the NRC published a notice in the *Federal Register* (i.e., 70 FR 53257) announcing the availability NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 25, Regarding Brunswick Steam Electric Plant, Units 1 and 2." The enclosure to this letter provides CP&L's comments on this supplement.

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

Sincerely,

Edward T. O'Neil
Manager - Support Services
Brunswick Steam Electric Plant

Progress Energy Carolinas, Inc.
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Enclosure:

Comments on Draft NUREG-1437, Supplement 25

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Comments on Draft NUREG-1437, Supplement 25

On October 18, 2004, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requested the renewal of the operating licenses for 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 September 9, 2005, the NRC published, for comment, NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 25, Regarding Brunswick Steam Electric Plant, Units 1 and 2." The following table provides CP&L's comments on this supplement.

Location	Comment
Page xii, line 15 Page 2-7, line 3 Page 2-14, line 21 Page 2-48, line 21	"BESP" should be "BSEP"
Page 1-8, line 2	The license renewal application was submitted by letter dated October 18, 2004.
Page 2-23, lines 14 and 32	<i>Symphurus plagiusa</i> is referred to as blackcheek tonguefish on line 14, and as sole on line 32.
Page 2-23, line 30	"king fish" should be "Southern kingfish"
Page 2-23, line 31	" <i>Mentaicirrhus</i> " should be " <i>Menticirrhus</i> "
Page 2-25, lines 6 - 8	Atlantic sturgeon's scientific name should be " <i>Acipenser oxyrhynchus</i> " versus " <i>Acipenser oxyrhynchus oxyrhynchus</i> "
Page 2-28, lines 35 - 36	It is requested that the last sentence be re-worded to state: No shortnose sturgeon have been collected at BSEP (CP&L 2004a). This is consistent with information presented in the license renewal application (i.e., page 2-12 of the Environmental Report).
Page 2-39, line 36	"Witherspoon" should be "Weatherspoon"

Location	Comment
Page 2-49, lines 26 - 29	<p>This section discusses erosion at Caswell Beach and speculation that the BSEP cooling water outfall may be a contribution factor.</p> <p>On page 3 of the July 2003 issue of the "Caswell Beach Sandpiper," published by the Town of Caswell Beach, there is discussion of investigation of beach erosion funded by the Town. The article states:</p> <p>... although an obvious erosion hot spot exists in the area extending from just east of the pumping station, this area experienced significant rates of erosion even before the pumping station was built. In fact, erosion rates in this area were considerably greater "before construction" compared to "after construction."</p> <p>Additionally, in an article in the April 16, 2003 edition of "The State Port Pilot," newspaper, entitled "Erosion not fault of outfall," the investigator is quoted as telling the town commissioners:</p> <p>There is nothing in the history of shoreline changes that would indicate that the pumping station has had any impact on shoreline changes along Caswell Beach and the east end of Oak Island.</p> <p>It is requested that this section be re-written to acknowledge the Town of Caswell Beach investigation.</p>
Page 4-31, line 9	"procedures" should be "a guideline"
Page 4-31, lines 10 and 11	<p>It is requested that the last sentence be re-written to state:</p> <p>This guideline provides that cultural resource assessments be performed for certain land-disturbing activities and provides guidance on inadvertent discoveries of graves or archaeological sites.</p>
Page 4-36, line 27	"licenser renewal" should be "license renewal"
Page 4-39, line 16	"Military Ocean Port Sunny Point" should be "Military Ocean Terminal Sunny Point"
Page 4-39, line 27	<p>It is requested that the words "and tracks" be removed from the sentence. The current wording overstates CP&L's activities regarding terrestrial species.</p>

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Enclosure

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Location	Comment
Page 8-50, line 26	"BFN" should be "BSEP"
Page G-28, line 38 - 39	The current maximum dependable capacity is 938 MWe for Unit 1 and 900 MWe for Unit 2. The value of 1006 MWe was used for conservatism.