



James Scarola
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Progress Energy Carolinas, Inc.

December 6, 2005

SERIAL: BSEP 05-0148

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
Revised License Renewal Commitment List
(NRC TAC Nos. MC4639 and MC4640)

References: 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.

In recent discussions with the NRC, CP&L was asked to update the list of License Renewal Commitments, using a revised format, and to identify the source document for each commitment. The requested revised summary list of BSEP License Renewal Commitments is enclosed.

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 December 6, 2005.

Sincerely,

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Enclosure:

BSEP License Renewal Commitments, Revision 7

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Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
1	The elements of corrective action, confirmation process, and administrative controls in the BSEP QA Program will be applied to required aging management activities for both safety related and non-safety related structures and components subject to aging management review.	A.1.1	Prior to the period of extended operation	Quality Assurance (QA) LRA Section B.1.3
2	The BSEP FAC susceptibility analyses will be updated to include additional components potentially susceptible to FAC.	A.1.1.5	Prior to the period of extended operation	Flow-Accelerated Corrosion (FAC) Program LRA Section B.2.5
3	The Bolting Integrity Program will be enhanced to: (1) add a precautionary note to bolting guidelines to limit the sulfur content of compounds used on bolted connections, (2) include ASME, Section XI, activities identified in NUREG-1801, Program XI.M18, and (3) incorporate monitoring and trending criteria under Systems Monitoring for bolted connections outside of ASME, Section XI, boundaries.	A.1.1.6	Prior to the period of extended operation	Bolting Integrity Program LRA Section B.2.6, Commitment Items (2) and (3) were added in response to Audit Question (AQ) 3.2-4 in BSEP letter dated March 14, 2005

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
4	The Open-Cycle Cooling Water System Program will be enhanced to require that: (1) Program scope include portions of the Service Water (SW) System credited in the Aging Management Review, including non-safety related piping, (2) the Residual Heat Removal (RHR) Heat Exchangers will be subject to eddy current testing with results compared to previous testing to evaluate degradation and aging, (3) a representative sampling of SW Pump casings be inspected, (4) Program procedures be enhanced to include verification of cooling flow and heat transfer effectiveness of SW Pump Oil Cooling Coils, inspections associated with SW flow to the Diesel Generators (including inspection of expansion joints), and inspection and replacement criteria for RHR Seal Coolers, (5) piping inspections will include locations where throttling or changes in flow direction might result in erosion of copper-nickel piping, and (6) performance testing of the RHR and Emergency Diesel Generator Jacket Water heat exchangers will be performed to verify heat transfer capability.	A.1.1.7	Prior to the period of extended operation	Open-Cycle Cooling Water System Program LRA Section B.2.7, Commitment Item (6) was added in response to AQ B.2.7-1 in BSEP letter dated March 31, 2005.
5	Closed-Cycle Cooling Water System Program activities will be enhanced to assure that Preventive Maintenance activities include inspections of Diesel Generator (DG) combustion air intercoolers and heat exchangers.	A.1.1.8	Prior to the period of extended operation	Closed-Cycle Cooling Water System Program LRA Section B.2.8
6	Administrative controls for the Program will be enhanced to: (1) include in the Program all cranes/platforms within the scope of License Renewal, (2) specify an annual inspection frequency for the Reactor Building Bridge Cranes and the Intake Structure Gantry Crane, and every fuel cycle for the Refuel Platforms, (3) allow use of maintenance crane inspections as input for the condition monitoring of License Renewal cranes, (4) require maintenance inspection reports to be forwarded to the responsible engineer, and (5) include inspection of structural component corrosion and monitoring crane rails for abnormal wear.	A.1.1.9	Prior to the period of extended operation	Inspection of Overhead Heavy Load and Light Load Handling LRA Section B.2.9

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
7	Program administrative controls will be enhanced to require: (1) obtaining non-intrusive baseline pipe thickness measurements at various locations, and (2) replacing the remainder of the plant's sprinkler heads prior to 50 years of sprinkler head service life. The results of the non-intrusive Fire Water System piping thickness measurements will be trended throughout the extended period of operation; the specific measurement intervals will be determined by engineering evaluation performed after each inspection to detect degradation prior to the loss of intended function.	A.1.1.11	Prior to the period of extended operation	Fire Water System Program LRA Section B.2.11, Commitment was revised in BSEP letter dated July 18, 2005 based on the NRC License Renewal Inspection of June 7 to 10, 2005.
8	The Aboveground Carbon Steel Tanks Program is a new aging management program that will be implemented.	A.1.1.12	Prior to the period of extended operation	Aboveground Carbon Steel Tanks Program LRA Section B.2.12
9	The Fuel Oil Chemistry Program administrative controls will be enhanced to: (1) add a requirement to trend data for water and particulates, (2) verify the condition of the in-scope fuel oil tanks by means of thickness measurements under the One-Time Inspection Program, and (3) perform an internal inspection of the Main Fuel Oil Storage Tank under the One-Time Inspection Program.	A.1.1.13	Prior to the period of extended operation	Fuel Oil Chemistry Program LRA Section B.2.13
10	The Reactor Vessel Surveillance Program will be enhanced to ensure that any additional requirements that result from the NRC review of Boiling Water Reactor Vessel Internals Program (BWRVIP)-116 are addressed.	A.1.1.14	Prior to the period of extended operation	Reactor Vessel Surveillance Program LRA Section B.2.14

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
11	The One-Time Inspection Program is a new aging management program that will be implemented and will include: (1) procedural controls to track, implement, complete, and report activities associated with one-time inspections, (2) inspection of the non-safety related core shroud head and separators and the surveillance capsule holder, (3) inspection of at least one of the four Emergency Diesel Engine Sumps, and at least one of the ten Service Water Pump Lubricating Oil Cooling Coils for corrosion products and evidence of moisture, and (4) application of inspection criteria consistent with NUREG-1801, Program XI.M32, including identification of specific sampling techniques, inspection locations, sample size, identification of inspection locations, examination technique, acceptance criteria, and evaluation of the need for follow-up examinations to address aging management program effectiveness for less than four-inch piping and fittings within ASME Code Class 1 boundaries. Verification of aging management program effectiveness for less than four-inch Class 1 piping components will be implemented by means of a sample of limiting components, scheduled late in the current operating term, at locations based on physical accessibility, exposure levels, NDE techniques, and locations identified in NRC Information Notice 97-46, as applicable, and applying an inspection of the inside surfaces of piping by destructive examination of replaced plant piping during modifications or NDE to ensure that cracking has not occurred.	A.1.1.15	Prior to the period of extended operation	One-Time Inspection Program LRA Section B.2.15, Commitment Item (2) was added in response to Request for Additional Information (RAI) B.2.28-8 in BSEP letter dated July 18, 2005. Item (3) was added in response to RAI 3.3-3 in BSEP letter dated August 11, 2005. Item (4) was added in response to AQs B.2.15-1 and B.2.15-2 in BSEP letter dated March 14, 2005.
12	The Selective Leaching of Materials Program is a new aging management program that will be implemented and will require a sample population of susceptible components to be selected for inspection.	A.1.1.16	Prior to the period of extended operation	Selective Leaching of Materials Program LRA Section B.2.16

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
13	The Buried Piping and Tanks Inspection Program is a new aging management program that will be implemented and will include procedural requirements to: (1) ensure an appropriate as-found pipe coating and material condition inspection is performed whenever buried piping within the scope of the Buried Piping and Tanks Inspection Program is exposed, or, as a minimum, once every 10 years, (2) add precautions concerning excavation and use of backfill to the excavation procedure to include precautions for License Renewal piping, (3) add a requirement that coating inspection shall be performed by qualified personnel to assess its condition, and (4) add a requirement that a coating engineer or other qualified individual should assist in evaluation of any coating degradation noted during the inspection.	A.1.1.17	Prior to the period of extended operation	Buried Piping and Tanks Inspection Program LRA Section B.2.17, The 10-year period in Commitment Item (1) was added in response to AQ B.2-17-1 in BSEP letter dated March 14, 2005.
14	The ASME Section XI, Subsection IWF Program will be enhanced to include the torus vent system supports within the scope of the Program.	A.1.1.20	Prior to the period of extended operation	ASME Section XI, Subsection IWF Program LRA Section B.2.20
15	The administrative controls for the Masonry Wall Program will be enhanced to require inspecting all accessible surfaces of the walls for evidence of cracking.	A.1.1.22	Prior to the period of extended operation	Masonry Wall Program LRA Section B.2.22

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
16	The Structures Monitoring Program will be enhanced to: (1) identify License Renewal systems managed by the Program and inspection boundaries between structures and systems, (2) require notification of the responsible engineer regarding availability of exposed below-grade concrete for inspection and require that an inspection be performed, (3) identify specific License Renewal commodities and inspection attributes, (4) require responsible engineer review of groundwater monitoring results, (5) specify that an increase in sample size for component supports shall be implemented (rather than should be) commensurate with the degradation mechanisms found, (6) improve training of system engineers in condition monitoring of structures, (7) include inspections of submerged portions of the Service Water Intake Structure on a frequency not to exceed five years, (8) specify an annual groundwater monitoring inspection frequency for concrete structures, and (9) specify the inspection frequency for the Service Water Intake Structure and Intake Canal to not exceed five years.	A.1.1.23	Prior to the period of extended operation	Structures Monitoring Program LRA Section B.2.23, Commitment Items (7), (8), and (9) were added in response to AQ B.2.23-2 in BSEP letter dated March 14, 2005.
17	The Protective Coating Monitoring and Maintenance Program administrative controls will be enhanced to: (1) add a requirement for a walk-through, general inspection of containment areas during each refueling outage, including all accessible pressure-boundary coatings not inspected under the ASME Section XI, Subsection IWE Program, (2) add a requirement for a detailed, focused inspection of areas noted as deficient during the general inspection, (3) assure that the qualification requirements for persons evaluating coatings are consistent among the Service Level I coating specifications, inspection procedures, and application procedures, and meet the requirements of ANSI N 101.4, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities," and (4) document the results of inspections and compare the results to previous inspection results and to acceptance criteria.	A.1.1.24	Prior to the period of extended operation	Protective Coating Monitoring and Maintenance Program LRA Section B.2.24

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
18	The Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program is a new aging management program that will be implemented.	A.1.1.25	Prior to the period of extended operation	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program LRA Section B.2.25
19	The Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits Program is a new aging management program that will be implemented and will include, for radiation monitoring instrumentation cables not included in the BSEP EQ Program, a review of calibration or surveillance results for indication of cable or connection degradation commencing before the end of the operating license term and at least once every 10 years thereafter. For cables in neutron flux instrumentation circuits testing frequency will be based on engineering evaluation not to exceed 10 years.	A.1.1.26	Prior to the period of extended operation	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits Program LRA Section B.2.26, Commitment was revised in response to AQ B.2.26-1 and AQ B.2.26-4 in BSEP letter dated March 14, 2005.

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
20	The Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program is a new aging management program that will be implemented and will include the provision that manholes containing medium-voltage cables in the scope of License Renewal will be inspected and accumulated water will be removed at least every two years by the Preventive Maintenance Program.	A.1.1.27	Prior to the period of extended operation	Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program LRA Section B.2.27, Commitment was revised in response to AQ B.2.27-1 in BSEP letter dated March 14, 2005.
21	The Program will be enhanced to: (1) expand the Program scope to include an evaluation of each reactor coolant pressure boundary component included in NUREG/CR-6260, (2) provide preventive action requirements including requirement for trending and consideration of operational changes to reduce the number or severity of transients affecting a component, (3) include a requirement to reassess the locations that are monitored considering the RCPB locations that were added to the Program scope, (4) specify the selection criterion to be locations with a 60-year CUF value (including environmental effects where applicable) of 0.5 or greater, other than those identified in NUREG/CR-6260, (5) address corrective actions for components approaching limits, with options to include a revised fatigue analysis, repair or replacement of the component, or in-service inspection of the component (with prior NRC approval), and (6) address criteria for increasing sample size for monitoring if a limiting location is determined to be approaching the design limit.	A.1.1.28	Prior to the period of extended operation	Reactor Coolant Pressure Boundary (RCPB) Fatigue Monitoring Program LRA Section B.3.1, Commitment Items (1) and (4) were revised in response to AQ B.3.1-1 in BSEP letter dated March 14, 2005.

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
22	<p>The Reactor Vessel and Internals Structural Integrity Program will be enhanced to: (1) incorporate augmented inspections of the top guide using enhanced visual examination or other acceptable inspection methods that will focus on the high fluence region, (2) establish inspection criteria for the VT-3 examination of the Core Shroud Repair Brackets, (3) the scope of the program described in the UFSAR Supplement will be revised to state that the program implements the following or latest BWRVIP guidelines:</p> <p>BWRVIP-03, BWRVIP-18, BWRVIP-25, BWRVIP-26, BWRVIP-27, BWRVIP-38, BWRVIP-41, BWRVIP-47, BWRVIP-48, BWRVIP-49, BWRVIP-74-A, BWRVIP-76, BWRVIP-94, and BWRVIP-139 (when reviewed and approved by the NRC)</p> <p>and (4) the scope of the program described in the UFSAR Supplement will be revised to state that:</p> <ul style="list-style-type: none"> • the Reactor Vessel and Internals Structural Integrity Program in conjunction with the Water Chemistry Program will be used to manage flow blockage due to fouling of the Core Spray lines and spargers (spray nozzles), • the Reactor Vessel and Internals Structural Integrity Program will be used to manage the aging of the non-safety related steam dryers and feedwater spargers, • loss of preload due to stress relaxation of the Unit 2 spring-loaded core plate plugs will be managed by replacing the plugs. Any evaluation to extend the service life of the spring-loaded core plate plugs will be submitted to the NRC for review and approval, and • either an ultrasonic examination alone or with a visual examination will be performed for the Access Hole Cover welds until other specific guidance is provided by the BWRVIP. 	A.1.1.30	Prior to the period of extended operation	<p>Reactor Vessel and Internals Structural Integrity Program</p> <p>LRA Section B.2.28, Commitment Items (1), (3), and (4) were revised in response to RAI B.2.28-15 in BSEP letter dated June 14, 2005. Item (3) and bullets two and three of Item (4) were revised by RAI B.2.28-15 (Supplemental Response) in BSEP letter dated July 18, 2005. Bullet four of Item (4) was added in response to RAI B.2.28-6 in BSEP letter dated July 18, 2005.</p>

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (URSAR) Supplement Location	Implementation Schedule	Source
23	A procedure will be developed to implement: (1) inspection of in-scope License Renewal components for identified aging effects, (2) guidelines for establishing inspection frequency requirements, (3) listing of inspection criteria in checklist form, (4) recording of extent of condition during system walkdowns, and (5) addressing of appropriate corrective action(s) for degradations discovered.	A.1.1.31	Prior to the period of extended operation	Systems Monitoring Program LRA Section B.2.29
24	Preventive maintenance activities will be incorporated into the PM Program, as needed, to accomplish aging management activities for components. Program activities include: (1) routine internal visual inspections for corrosion of the Demineralized Water Tank, (2) regular monitoring and removal of debris to manage accumulation of sludge, dirt/dust, rust, and other miscellaneous debris in the torus, (3) periodic inspection of high-voltage insulators for water beading on silicone coating and for age related degradation, (4) routine sampling and analysis to address corrosion concerns related to potential water intrusion into lubricating oil in the Service Water Pump Motor Cooler Coils and the Emergency Diesel Engines Lube Oil System, and (5) inspections of floor drains periodically exposed to service water and roof drains exposed to coastal atmospheric conditions to address aging concerns related to potential locally aggressive environments.	A.1.1.32	Prior to the period of extended operation	Preventive Maintenance (PM) Program LRA Section B.2.30, Commitment Item (1) was added in response to AQ B.2.2-6 in BSEP letter dated March 14, 2005. Item (2) was added in response to AQ B.2.24-1 in BSEP letter dated March 14, 2005. Item (3) was added in response to RAI 3.6.2.3-3 in BSEP letter dated June 14, 2005. Item (4) was added in response to RAI 3.3-3 in BSEP letter dated August 11, 2005. Item (5) was added in response to RAI 3.3.2-5-1 in BSEP letter dated August 11, 2005.

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
25	The Phase Bus Aging Management Program is a new aging management program that will be implemented and will include: (1) inspecting the interior condition of the bus enclosure for foreign debris, excessive dust build up, and evidence of water intrusion, (2) use of the Structures Monitoring Program to inspect the external surfaces of the phase bus housing, and (3) checking accessible and inaccessible Phase Bus bolted connections for loose connections by thermography or by measuring connection resistance using a low range ohmmeter on a 10-year frequency. Thermography will be performed while the bus is energized and loaded.	A.1.1.33	Prior to the period of extended operation	Phase Bus Aging Management Program LRA Section B.2.31, Commitment Items (1) and (2) were added in response to RAI 3.6.2.3-1 in BSEP letter dated June 14, 2005. Item (3) was added in response to RAI 3.6.2.3-1.b.3 in BSEP letter dated July 18, 2005.
26	The Fuel Pool Girder Tendon Inspection Program will be enhanced to: (1) specify inspection frequencies, numbers of tendons to be inspected, and requirements for expansion of sample size, (2) identify test requirements and acceptance criteria for tendon lift-off forces, measurement of tendon elongation, and determination of ultimate strength, (3) specify inspections for tendons, tendon anchor assemblies, surrounding concrete, and grease, (4) require prestress values to be trended and compared to projected values, and (5) identify acceptable corrective actions for tendons that fail to meet testing criteria.	A.1.1.34	Prior to the period of extended operation	Fuel Pool Girder Tendon Inspection Program LRA Section B.2.32

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
27	P-T limit curves for use during the periods of extended operation of BSEP Units 1 and 2 will be submitted for NRC review and approval in accordance with the 10 CFR 50.90 license amendment process at least one year prior to expiration of the 32 EFPY P-T limit curves that are currently approved in the BSEP Technical Specifications. Also, if an exemption request to permit the use of ASME Code Case N-640 is required as part of the submittal, an exemption request will be included as part of the license amendment request.	A.1.2.1.3	As noted in the commitment	Time Limited Aging Analysis (TLAA) - RPV Operating Pressure-Temperature (P-T) Limits LRA Section 4.2.4, Commitment was added in response to RAI 4.2.4-1 in BSEP letter dated May 4, 2005, and revised in response to RAI 4.2.4-1 (Supplemental Response) in BSEP letter dated July 18, 2005.
28	Management of Core Plate Plug Spring Stress Relaxation will be performed by means of the Reactor Vessel and Internals Structural Integrity Program.	A.1.2.1.7 A.1.1.30	As noted in the commitment	TLAA – Core Plate Plug Spring Stress Relaxation LRA Section 4.2.8
29	A Fuel Pool Girder Tendon Inspection Program will be implemented to assure design basis anchor forces required for the tendons to perform their intended function will continue to be maintained.	A.1.2.6 A.1.1.34	Prior to the period of extended operation	TLAA – Fuel Pool Girder Tendon Loss of Prestress LRA Section 4.7.2
30	Measurements are planned, using the One-Time Inspection Program, to verify by volumetric measurements the actual rate of corrosion of the supports and platform steel in the torus.	A.1.2.8 A.1.1.15	Prior to the period of extended operation	TLAA – Torus Component Corrosion Allowance LRA Section 4.7.4

Brunswick Steam Electric Plant (BSEP) License Renewal Commitments, Revision 7				
Item No.	Commitment	Updated Final Safety Analysis Report (UFSAR) Supplement Location	Implementation Schedule	Source
31	An evaluation of plant and industry operating experience will be submitted for NRC review at least one year prior to the period of extended operation. The purpose of the evaluation will be to assure that relevant aging effects caused by operation at power uprate conditions are adequately addressed by aging management programs.	None Refer to the ACRS letter report on license renewal of Dresden/Quad Cities, dated September 16, 2004.	One year prior to the period of extended operation	Potential Aging Effects/Mechanisms Resulting from Power Uprate Commitment added in BSEP letter dated May 11, 2005

BSEP Letter Date	Serial Number	Subject	ADAMS Accession Number
March 14, 2005	BSEP 05-0041	Response to Audit Questions - License Renewal NUREG-1801 Consistency Audit	ML050810493
March 31, 2005	BSEP 05-0044	Response to Request for Additional Information - License Renewal	ML050970259
May 4, 2005	BSEP 05-0050	Response to Request for Additional Information - License Renewal	ML051330020
May 11, 2005	BSEP 05-0055	Response to Request for Additional Information - License Renewal	ML051370298
June 14, 2005	BSEP 05-0071	Response to Request for Additional Information - License Renewal	ML051720468
July 18, 2005	BSEP 05-0097	Clarification of Responses to Requests for Additional Information - License Renewal	ML052070762
August 11, 2005	BSEP 05-0112	Supplemental Responses to Requests for Additional Information - License Renewal	ML052310238