



Progress Energy

James Scarola
Vice President
Brunswick Nuclear Plant
Progress Energy Carolinas, Inc.

March 24, 2006

SERIAL: BSEP 06-0035

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
Revision to License Renewal Commitment
(NRC TAC Nos. MC4639 and MC4640)

- 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 James Scarola to the U. S. Nuclear Regulatory Commission (Serial: BSEP 05-0148), "Revised License Renewal Commitment List," dated December 6, 2005 (ML053500114)

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.

During recent discussions with the NRC, CP&L was asked to clarify License Renewal Commitment 22, which had been included in a letter to the NRC dated December 6, 2005. The requested clarification 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 March 24, 2006.

Sincerely,

James Scarola

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AMM

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Enclosure: Revised License Renewal Commitment 22

cc:

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Revised License Renewal Commitment 22 (revised areas are underlined)				
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; <u>sample size will be 10% of the affected susceptible area within 12 years of the beginning of the period of extended operation, with 5% being completed within 6 years of the beginning of the period of extended operation.</u> (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 	A.1.1.30	Prior to the period of extended operation, <u>with the exception of the schedule for augmented inspections of top guides which is noted in the commitment.</u>	<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>

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	<ul style="list-style-type: none">• 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.			