

June 21, 2006

Dr. Graham B. Wallis, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RESPONSE TO ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
REPORT ON THE SAFETY ASPECTS OF THE LICENSE RENEWAL
APPLICATION FOR THE BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1
AND 2

Dear Dr. Wallis:

During the 532nd meeting of the Advisory Committee on Reactor Safeguards (ACRS or the Committee), held on May 4, 2006, the ACRS completed its review of the license renewal application (LRA) for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2, and the associated final safety evaluation report (SER) prepared by the U.S. Nuclear Regulatory Commission (NRC) staff.

In its final report, the Committee recommended the renewal of the operating licenses for BSEP, Units 1 and 2, with the conclusions and recommendations discussed in your letter dated May 17, 2006. We appreciate the Committee's objective and in-depth review of the BSEP application and the staff's final SER. The staff agrees with the Committee's conclusions:

1. The programs committed to and established by the applicant to manage age-related degradation provide reasonable assurance that BSEP, Units 1 and 2 can be operated in accordance with their current licensing basis for the period of extended operation with no undue risk to the health and safety of the public.
2. CP&L's application for renewal of the operating licenses for BSEP, Units 1 and 2 should be approved.

The staff's resolution and disposition of the Committee's recommendation is elaborated below:

3. The staff's new two-tiered process for reviewing the scoping of balance of plant (BOP) systems was effective and improved the efficiency of the review. This process should be used by the staff in its review of future license renewal applications.

The BSEP license renewal application was the first to be reviewed using the new two-tiered process for the scoping of BOP systems. In Tier 1, the staff reviewed the LRA and the Updated Final Safety Analysis Report to identify apparent missing components for an aging management review. In Tier 2, the staff reviewed the license renewal boundary drawings and other licensing basis documents in addition to the LRA and the Updated Final Safety Analysis Report. The screening criteria used to identify systems for the detailed Tier-2 review were

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based on the safety importance or risk significance; potential for system failure to cause failure of redundant safety system trains; operating experience indicating likely passive failures; and experience from reviews of previous LRAs indicating likely omissions. For this LRA, the staff performed a Tier-1 review of 15 BOP systems and a Tier-2 review of 24 BOP systems. The two-tiered review process was effective, and the staff will take this process into consideration in its review of future LRAs.

The staff recognizes the ACRS's commitment to safety and appreciates the Committee's continued support of the license renewal process.

Sincerely,

/RA/

Luis A. Reyes
Executive Director
for Operations

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko
Commissioner Lyons
SECY

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