



**Progress Energy**

10 CFR 50.55a(g)(4)(iv)

**JUN 24 2008**

SERIAL: BSEP 08-0079

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  
Requests to Use a Subsequent Edition of the ASME Code and Addenda for  
the Third 10-Year Inservice Inspection Program

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(g)(4)(iv), Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requests approval for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, to use a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, for (1) performance of repair/replacement activities and pressure testing associated with the repair/replacement activities and (2) examination methods and qualification of nondestructive examination personnel. Details on these two requests are provided in Enclosures 1 and 2. The two requests have been prepared in accordance with template 3 of the June 2004, NEI White Paper, Revision 1, titled "Standard Format for Requests from Commercial Reactor Licensees Pursuant to 10 CFR 50.55a."

CP&L requests approval, by December 30, 2008, of these requests to use a later edition of the ASME Code, Section XI.

No regulatory commitments are contained in this letter. Please refer any questions regarding this submittal to Mr. Gene Atkinson, Supervisor - Licensing/Regulatory Programs, at (910) 457-2056.

Sincerely,

A handwritten signature in black ink that reads "Randy C. Ivey".

Randy C. Ivey  
Manager - Support Services  
Brunswick Steam Electric Plant

Progress Energy Carolinas, Inc.  
Brunswick Nuclear Plant  
PO Box 10429  
Southport, NC 28461

A047  
NRK

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WRM/wrm

Enclosures:

1. 10 CFR 50.55a Request Number RR-40
2. 10 CFR 50.55a Request Number RR-41

cc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II  
ATTN: Mr. Luis A. Reyes, Regional Administrator  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Joseph D. Austin, NRC Senior Resident Inspector  
8470 River Road  
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission **(Electronic Copy Only)**  
ATTN: Mrs. Farideh E. Saba (Mail Stop OWFN 8G9A)  
11555 Rockville Pike  
Rockville, MD 20852-2738

Chair - North Carolina Utilities Commission  
P.O. Box 29510  
Raleigh, NC 27626-0510

Mr. Jack Given, Bureau Chief  
North Carolina Department of Labor  
Boiler Safety Bureau  
1101 Mail Service Center  
Raleigh, NC 27699-1101

**10 CFR 50.55a Request Number RR-40****Request in Accordance with 10 CFR 50.55a(g)(4)(iv)  
for Inservice Inspection Items****1. ASME Code Components Affected**

Code Class: Class 1, 2, and 3

Category: Not Applicable

Systems: See Attachment 1

Affected Components: See Attachment 1

**2. Applicable Code Edition and Addenda**

The Code of Record for the third 10-year inservice inspection interval at the Brunswick Steam Electric Plant (BSEP), Units 1 and 2, is the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 1989 Edition with no Addenda.

**3. Proposed Subsequent Code Edition and Addenda (or Portion)**

As allowed by paragraph IWA-2430(d) of the 1989 Edition of the ASME Code, Section XI, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., has extended the third 10-year inservice inspection interval by one year. This extension enables the completion of Unit 2 examinations coinciding with Refueling Outage B219R1, which is currently scheduled to begin February 28, 2009.

The extension of third interval does not alter the start of the successive interval, which began on May 11, 2008. During the fourth 10-year inservice inspection interval, CP&L is implementing the requirements of the ASME Code, Section XI, 2001 Edition with 2003 Addenda.

To eliminate the potential for human error associated with implementing two different editions of the ASME Code, Section XI, CP&L requests permission, in accordance with 10 CFR 50.55a(g)(4)(iv), to utilize IWA-4000, "Repair/Replacement Activities," in the 2001 Edition with the 2003 Addenda of the ASME Code, Section XI, for the performance of repair/replacement activities and the pressure tests associated with these repair/replacement activities. In addition to the applicable requirements of the ASME Code, Section XI, CP&L will comply with all applicable modifications and limitations specified in 10 CFR 50.55a.

Implementation of the 2001 Edition with the 2003 Addenda requirements for the performance of repair/replacement activities and associated pressure tests will not alter the selection and scheduling of the remaining Class 1, 2, and 3 examinations. For the remainder of the third 10-year inspection interval, CP&L will continue to select and schedule examinations in accordance with the applicable requirements specified in the ASME Code, Section XI, 1989 Edition with no Addenda or approved alternatives.

**4. Related Requirements**

CP&L is requesting permission to use the 2001 Edition with the 2003 Addenda of the ASME Code, Section XI for the performance of a repair/replacement activity and pressure testing associated with the repair/replacement activity. In making this request, CP&L will comply with all related requirements of the 2001 Edition with the 2003 Addenda that could be used or referenced for the performance of a repair/replacement activity and associated pressure test.

**5. Duration of Proposed Request**

Use of this proposed third interval request will begin from approval by the NRC, and will conclude on May 10, 2009.

**6. References**

1. Title 10 of the Code of Federal Regulations, Part 50, Section 55a, "Codes and Standards" (i.e., 10 CFR 50.55a)
2. ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 1989 Edition with no Addenda
3. ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 2001 Edition with 2003 Addenda

**Attachment 1  
 Systems and Associated Components**

<u>Systems</u>	<u>Components</u>		
	<u>ISI Class 1</u>	<u>ISI Class 2</u>	<u>ISI Class 3</u>
Containment Isolation:			
Containment Atmosphere Control (2070)		✓	
Drywell Drains (6235 and 6240)		✓	
Hydrogen Monitoring (2070)		✓	
Instrument Air Supply (6135)		✓	
Post Accident Sampling (2117)		✓	
Reactor Building Sampling (2115)	✓	✓	
Torus Drain (2190)		✓	
Traversing Incore Probe (1050)		✓	
Control Rod Drive Hydraulic (1070)	✓	✓	
Core Spray (2035)	✓	✓	
Nuclear Steam Supply (1005)	✓		
Fuel Pool Cooling (7110)		✓	
High Pressure Coolant Injection (2095)	✓	✓	
Reactor Building Close Cooling Water (4070)		✓	
Reactor Coolant Recirculation (2020)	✓	✓	
Reactor Core Isolation Cooling (2100)	✓	✓	
Reactor Water Cleanup (2010)	✓		
Residual Heat Removal (2045)	✓	✓	✓
Standby Gas Treatment (7071)		✓	
Standby Liquid Control (2040)	✓	✓	
Service Water (4060)			✓

**10 CFR 50.55a Request Number RR-41****Request in Accordance with 10 CFR 50.55a(g)(4)(iv)  
for Inservice Inspection Items****1. ASME Code Components Affected**

Code Class: Class 1, 2, and 3

Category: Not Applicable

Systems: See Attachment 1

Affected Components: See Attachment 1

**2. Applicable Code Edition and Addenda**

The Code of Record for the third 10-year inservice inspection interval at the Brunswick Steam Electric Plant (BSEP), Units 1 and 2, is the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 1989 Edition with no Addenda.

**3. Proposed Subsequent Code Edition and Addenda (or Portion)**

As allowed by paragraph IWA-2430(d) of the 1989 Edition of the ASME Code, Section XI, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., has extended the third 10-year inservice inspection interval by one year. This extension enables the completion of Unit 2 examinations coinciding with Refueling Outage B219R1, which is currently scheduled to begin February 28, 2009.

The extension of third interval does not alter the start of the successive interval, which began on May 11, 2008. During the fourth 10-year inservice inspection interval, CP&L is implementing the requirements of the ASME Code, Section XI, 2001 Edition with 2003 Addenda.

To eliminate the potential for human error associated with implementing two different editions of the ASME Code, Section XI, CP&L requests permission, in accordance with 10 CFR 50.55a(g)(4)(iv), to utilize IWA-2200, "Examination Methods," and IWA-2300, "Qualification of Nondestructive Examination Personnel," in the 2001 Edition with the 2003 Addenda of the ASME Code, Section XI. In addition to the applicable requirements of the ASME Code, Section XI, CP&L will comply with all applicable modifications and limitations specified in 10 CFR 50.55a.

Implementation of the 2001 Edition with the 2003 Addenda requirements for the performance of examination methods and qualifications of nondestructive examination personnel will not alter the selection and scheduling of the remaining Class 1, 2, and 3 examinations. For the remainder of the third 10-year inspection interval, CP&L will continue to select and schedule examinations in accordance with the applicable requirements specified in the ASME Code, Section XI, 1989 Edition with no Addenda or approved alternatives.

**4. Related Requirements**

CP&L is requesting permission to use the 2001 Edition with the 2003 Addenda of the ASME Code, Section XI for examination methods and qualification of nondestructive examination personnel. In making this request, CP&L will comply with all related requirements of the 2001 Edition with the 2003 Addenda that could be used or referenced for examination methods and qualification of nondestructive examination personnel.

**5. Duration of Proposed Request**

Use of this proposed third interval request will begin from approval by the NRC, and will conclude on May 10, 2009.

**6. References**

1. Title 10 of the Code of Federal Regulations, Part 50, Section 55a, "Codes and Standards" (i.e., 10 CFR 50.55a)
2. ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 1989 Edition with no Addenda
3. ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 2001 Edition with 2003 Addenda

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Containment Isolation:			
Containment Atmosphere Control (2070)		✓	
Drywell Drains (6235 and 6240)		✓	
Hydrogen Monitoring (2070)		✓	
Instrument Air Supply (6135)		✓	
Post Accident Sampling (2117)		✓	
Reactor Building Sampling (2115)	✓	✓	
Torus Drain (2190)		✓	
Traversing Incore Probe (1050)		✓	
Control Rod Drive Hydraulic (1070)	✓	✓	
Core Spray (2035)	✓	✓	
Nuclear Steam Supply (1005)	✓		
Fuel Pool Cooling (7110)		✓	
High Pressure Coolant Injection (2095)	✓	✓	
Reactor Building Close Cooling Water (4070)		✓	
Reactor Coolant Recirculation (2020)	✓	✓	
Reactor Core Isolation Cooling (2100)	✓	✓	
Reactor Water Cleanup (2010)	✓		
Residual Heat Removal (2045)	✓	✓	✓
Standby Gas Treatment (7071)		✓	
Standby Liquid Control (2040)	✓	✓	
Service Water (4060)			✓