



**Progress Energy**

July 14, 2008

SERIAL: BSEP 08-0087

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  
Response to Request for Additional Information Regarding Relief Request  
CIP-01 for the Fourth 10-Year Inservice Inspection Interval (NRC TAC  
Nos. MD8120 and MD8121)

Reference: Letter from Randy C. Ivey (CP&L), Relief Requests Associated With the  
Fourth 10-Year Inservice Inspection Interval, dated February 6, 2008,  
ADAMS Accession Number ML080450249

Ladies and Gentlemen:

By letter dated February 6, 2008, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., submitted relief requests associated with the fourth 10-year inservice inspection interval at the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. On June 27, 2008, via electronic mail, the NRC requested additional information regarding relief request CIP-01, which pertains to the repair/replacement activities performed on the pressure retaining boundary of American Society of Mechanical Engineers (ASME) Code Class MC or Class CC components. Responses to those NRC questions are enclosed.

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,

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Enclosure: Response to NRC Request for Additional Information Regarding Relief  
Request CIP-01

cc (with enclosure):

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Response to NRC Request for Additional Information Regarding Relief Request CIP-01

By letter dated February 6, 2008, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., submitted relief requests associated with the fourth 10-year inservice inspection interval at the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. On June 27, 2008, via electronic mail, the NRC requested additional information regarding relief request CIP-01, which pertains to the repair/replacement activities performed on the pressure retaining boundary of American Society of Mechanical Engineers (ASME) Code Class MC or Class CC components. Responses to those NRC questions are provided below.

NRC Request 1:

Section 4 of Enclosure 2 (relief request CIP-01) to your letter states the following:

"Option B of Appendix J also has requirements for leakage rate following repairs, replacements, and modifications that affect the containment leakage integrity."

Please clarify this statement relative to the wording of regulations in 10 CFR 50, Appendix J, Option B.

CP&L Response:

The purpose of the above statement was to clarify that Option B in Appendix J, like Option A, has requirements for the performance of leakage rate testing following repairs and modifications that affect the containment leakage integrity. These requirements are outlined in Section 9.2.4, Containment Repairs and Modifications, of NEI 94-01, Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J.

In Section I, Introduction, of Option B, Regulatory Guide 1.163, Performance-Based Containment Leak-Test Program, is referenced as providing specific guidance that may be used to implement the requirements of Option B. As stated in Section C, Regulatory Position, of this regulatory guide, the guidance provided in NEI 94-01 provides methods acceptable to the NRC for complying with the provisions of Option B.

Section 9.2.4 of NEI 94-01 specifies the requirements for repairs and modifications that affect the containment leakage integrity. Regulatory Guide 1.163 takes no exception to the requirements specified in Section 9.2.4 of NEI 94-01. For this reason, CP&L proposes implementing the requirements of Section 9.2.4 of NEI 94-01 as an acceptable alternative to the requirements of IWE-5221.

NRC Request 2:

Section 5 of Enclosure 2 (relief request CIP-01) to your letter states the following:

"Regulatory Guide 1.163 was developed as a method acceptable to the NRC staff for implementing Option B of 10 CFR 50, Appendix J. This regulatory guide states that NEI 94-01 provides acceptable methods for complying with Option B."

Regulatory Guide 1.163 takes several exceptions to NEI 94-01. Specifically in Regulatory Position 4, the alternative test or analysis noted in Section 10.2.3.3, "Repairs or Adjustments," has not been endorsed. Please clarify the statement in Section 5 of Enclosure 2 (relief request CIP-01).

CP&L Response:

Section 10.2.3.3, Repairs or Adjustments, of NEI 94-01 provides criteria pertaining to Type C testing. As clarified in Appendix J, a Type C test is intended to measure a containment isolation valve leakage rate. The proposed alternative in Relief Request CIP-01 will not affect the performance of any Type C testing or any activity (i.e., repair or adjustment) associated with a Type C test.

Relief Request CIP-01 proposes implementing the requirements specified in Section 9.2.4 of NEI 94-01 for repairs and modifications that affect the containment leakage integrity. Regulatory Guide 1.163 takes no exception to the requirements specified in Section 9.2.4 of NEI 94-01.

NRC Request 3:

Section 9.2.4 of NEI 94-01 states the following:

"Repairs and modifications that affect the containment leakage integrity require leakage rate testing (Type A testing or local leakage rate testing) prior to returning the containment to operation."

Please provide further information relative to implementation of this statement and type of testing planned for the affected components listed in Enclosure 2 (relief request CIP-01) Pages 4 through 10. Also, please clarify your plans to perform Type A testing subsequent to major repair, replacement, or modification activities.

CP&L Response:

With the exception of the activities listed below, CP&L proposes to perform a leakage rate test in accordance with Section 9.2.4 of NEI 94-01 on any repair or modification to a component listed

in the component list provided in Relief Request CIP-01 that affects the containment leakage integrity. This leakage test will be performed prior to returning the containment to service.

1. Welds of attachments to the surface of steel pressure-retaining boundary;
2. repair cavities, the depth that does not penetrate required designed steel wall by more than 10 percent; or
3. welds attaching to steel pressure-retaining boundary penetrations, where the nominal diameter of the welds or penetrations does not exceed one inch.