Progress Energy

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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 ISI-03 for the Fourth 10-Year Inservice Inspection Interval (NRC TAC Nos. MD8116 and MD8117)

Reference: Letter from Randy C. Ivey (CP&L), Response to Request for Additional Information Regarding Relief Request ISI-03 for the Fourth 10-Year Inservice Inspection Interval (NRC TAC Nos. MD8116 and MD8117), June 26, 2008, ADAMS Accession Number ML081910148.

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

Ladies and Gentlemen:

By letter dated February 6, 2008, Carolina Power & Light Company, 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 July 31, 2008, a telephone conference call was held with the NRC to discuss responses submitted by CP&L's letter dated June 26, 2008. As a result of the call, the NRC requested that CP&L clarify the responses provided to Questions 4 and 7. The requested information is 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,

Philip A. Leich

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Enclosure: Response to NRC Request for Additional Information Regarding Relief Request ISI-03

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Response to NRC Request for Additional Information Regarding Relief Request ISI-03

By letter dated February 6, 2008, Carolina Power & Light Company, 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 July 31, 2008, a telephone conference call was held with the NRC to discuss responses submitted by CP&L's letter dated June 26, 2008. As a result of the call, the NRC requested that CP&L clarify the responses provided to Questions 4 and 7. The requested information is provided below.

NRC Request 4:

Please verify that functional test in accordance with TRM Figure 3.21-1 as specified in TRM TR 3.21.3(2), is equivalent to functional test of "37 testing sample plan" as specified in Section 3.2.3 of the ASME OM Part 4 (OM-4).

NRC Comment on Response 4:

Brunswick is using ASME Section XI, Edition 2001 thru 2003 Addenda, IWF-5000 for snubber examination and testing. IWF-5200(b) and IWF-5300(b) require that preservice and inservice tests be performed in accordance with ASME/ANSI OM Part 4. ASME Section XI, Table IWA-1600-1 requires that ASME/ANSI OM (Part 4) shall be 1987 with OMa-1988 (Addenda). The BSEP TRM Figure 3.21-1 test plan is exactly the same as ASME/ANSI OM Part 4 (OM-4), Edition 1987 with OMa-1988. Again, the ASME OM Part 4, Edition 1987 with OMa-1988, as required by ASME Section XI, IWF-5000 is different than the ASME OM Code. Therefore, the second line (above) statement in Brunswick response needs clarification.

CP&L Response:

The second line statement in the previous Brunswick response was comparing the Technical Requirements Manual (TRM) Figure 3.21-1 with later editions of the OM Code, which have a different figure for test sampling.

The TRM Figure 3.21-1 is equivalent to the functional test requirements of the "37 testing sample plan," as specified in Section 3.2.3 of the ASME/ANSI OM Part-4 OM-1987 with OMa-1988. Therefore, the test sampling plan in TRM Figure 3.21-1 and the test sampling plan in ASME/ANSI OM Part-4 OM-1987 with OMa-1988 are equivalent in the snubber selection process.

NRC Request 7:

The relief request and the BSEP TRM do not address the requirements of OM Part 4, Section 3.2.4, specifically Section 3.2.4.2, "Test Failure Mode Groups," related to functional testing of snubbers. Please explain how the BSEP TRM meets this requirement.

NRC Comment on Response 7:

As mentioned above, ASME/ANSI OM Part 4, Edition 1987 with OMa-1988, as required by ASME XI, IWF-5000, is different than the ASME OM Code. ASME Section XI, OM Part 4, Section 3.2.4.2, "Test Failure Mode Groups," requires that unacceptable snubbers shall be categorized into test failure mode group(s). Therefore, please clarify and explain how the TRM meets this requirement.

CP&L Response:

Failure Mode Grouping is a method to determine the extent of condition of a snubber failure, and the population or grouping for sample expansion. Failure Mode Grouping is not incorporated into the TRM; however, plant procedures do address determining the extent of condition and determining failure grouping for sample expansion.

The occurrence of unacceptable snubbers is documented by an Action Request in the Corrective Action Program. CP&L procedure 0ENP-16.15, "Administrative Procedure for Component Support and Snubber Program," addresses the evaluation and the cause of failure for snubbers which do not meet acceptance criteria. Paragraph 5.2.3.3 of this procedure states:

> Snubbers which fail the functional test acceptance criteria, shall be repaired or replaced. In addition, an Action Request shall be initiated for each failure which will drive an evaluation to determine the cause of failure and corrective actions to be taken. The results of this evaluation shall be used, if applicable, in the selection of additional snubbers to be tested that may be subject to the same type of failure.

Therefore, the selection of additional snubbers for testing, which are subject to the same type of failure, fulfills the requirement for unacceptable snubbers to be categorized into test failure mode groups.