Progress Energy

SEP 0 8 2008

SERIAL: BSEP 08-0115

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 Philip A. Leich (CP&L), 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), dated July 14, 2008, ADAMS Accession Number ML082050398

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, 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 August 4, 2008, a telephone conference call was held with the NRC to discuss the response to the request for additional information submitted by CP&L's letter dated July 14, 2008. As a result of the call, the NRC requested that CP&L clarify the responses provided to Questions 1 and 3. 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

Philip A. Leich
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NRR

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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, 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 August 4, 2008, a telephone conference call was held with the NRC to discuss the response to the request for additional information submitted by CP&L's letter dated July 14, 2008. As a result of the call, the NRC requested that CP&L clarify the responses provided to Questions 1 and 3. The requested information is provided below.

NRC Follow-up to Request 1:

The initial NRC question asked for clarification regarding the requirements for leakage rate testing following repairs, replacements, and modifications. The licensee's response discussed both the requirements for leakage testing contained in Option B in Appendix J of 10 CFR Part 50 and the requirements for repairs and modifications contained in NEI 94-01. Please clarify that the requirements of NEI 94-01, rather than Option B in Appendix J, will be followed for leakage rate testing following repairs, replacements, and modifications.

CP&L Response:

As stated in Section C, "Regulatory Position," of Regulatory Guide 1.163, the guidance provided in NEI 94-01 provides methods acceptable to the NRC for complying with the provisions of Option B in Appendix J to 10 CFR Part 50. In Appendix J to 10 CFR Part 50, Section V, "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.

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

NRC Follow-up to Request 3:

With regard to the licensee's response to Question 3, please clarify whether it is the licensee's intent to perform leakage rate testing of components affecting containment integrity or whether the licensee intends to defer such leakage rate testing.

CP&L Response:

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 rate test will be performed prior to returning the containment to service. As allowed by Section 9.2.4 of NEI 94-01, and provided non-destructive examinations have been satisfactorily performed in accordance with the repair/replacement program, leakage rate testing for the activities listed below may be deferred until the next scheduled leakage test:

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.