

September 30, 2008

Mr. Benjamin Waldrep, Vice President
Brunswick Steam Electric Plant
Carolina Power & Light Company
Post Office Box 10429
Southport, North Carolina 28461

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 - AUDIT OF THE
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NOS. MD8962 AND MD8963)

Dear Mr. Waldrep:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U. S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute document (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented.

An audit of Carolina Power and Light Company's commitment management program was performed at the plant site during the period of June 24 through and 26, 2008. Based on the audit, the NRC staff concluded that (1) Brunswick Steam Electric Plant (BSEP), Units 1 and 2 has implemented NRC commitments on a timely basis, and (2) BSEP has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

/RA/

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-325 and 50-324]

Enclosure: Audit Report

cc w/encl: See next page

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-325 AND 50-324

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U. S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute document (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the licensee's regulatory commitments are being effectively implemented.

The document NEI 99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Brunswick Steam Electric Plant (BSEP), Units 1 and 2 commitment management program was performed at the plant site during the period June 24 through 26, 2008. This was the first audit recorded; the audit reviewed commitments made since 2004. In addition, a sample of the regulatory commitments associated with the extended power uprate (EPU) prior to 2004 was reviewed. The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed and (2) verification of the licensee's program for managing changes to NRC commitments.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not

Enclosure

yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Regulatory Commitments Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.), or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff searched ADAMS for the licensee's submittals the last 4 years and selected a representative sample for verification.

The audit excluded the following types of commitments that are internal to licensee processes:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, technical specifications (TSs), and updated final safety analysis reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Regulatory Commitments Implementation Audit Results

The licensee's commitment management program is described in the Progress Energy Corporation (PEC), Nuclear Generation Group, Standard Procedure REG-NGGC-0110, Revision 2, "Regulatory Commitments." This procedure superseded the Carolina Power and Light Company (CP&L), Brunswick Nuclear Plant Program Procedure OPLP-26, "Establishment and Management of Commitments to Regulatory Agencies," Revision 5. The PEC procedure is applicable to regulatory commitments made or modified after the effective date of this procedure.

The NRC staff reviewed the licensee's procedure REG-NGGC-0110 and found that it includes the following statements, which provide guidance to the licensee that is consistent with the intent of NEI 99-04, and ensure that BSEP is appropriately implementing regulatory commitments:

In the case where a third party (e.g., NEI, an owners group, or another organization) has been authorized to make Regulatory Commitments on behalf of the Licensee, the affected Licensee shall ensure that statements represented as Regulatory Commitments are appropriately documented and are subsequently managed in accordance with REG-NGGC-0110.

Docketed correspondence containing action items shall also contain an explicit statement concerning the existence of any Regulatory Commitment.

Each Regulatory Commitment shall be captured in a PassPort[®] Action Request (AR).

The Responsible Licensing Supervisor, or designee, shall ensure the accuracy of any implicit or explicit re-statement of a Regulatory Commitment in docketed correspondence received from the NRC to ensure that written or oral communication has not been misconstrued.

Except for “discretionary enforcement” situations, advise the NRC that an oral statement to take a certain action represents an intent to make a Regulatory Commitment but does not constitute a Regulatory Commitment until submitted by the Licensee in writing on the docket.

An Assignment associated with a Regulatory Commitment must include appropriate reference to implementing documentation to provide traceability for the Regulatory Commitment.

The Responsible Licensing Supervisor, or designee, shall consider the need to incorporate the Regulatory Commitment into an NRC mandated licensing basis document such as the UFSAR, Quality Assurance Program, Emergency Plan, Security Plan, Fire Protection Program, etc.

If a Regulatory Commitment is not implemented as described by the due date or if non-compliance with Regulatory Commitment occurs, the Responsible Licensing Supervisor, or designee, shall initiate a Nuclear Condition Report, and, if necessary, notify the NRC.

Interviews with the BSEP personnel provided the information on the existing mechanism for managing regulatory commitments. At present, the licensee enters commitments made to the NRC into a commitment database called “PassPort[®].” The PassPort[®] database handles the commitments that are open or active. This database is used to track all commitments, including commitments to state and other agencies, and also tracks other plant activities. Each regulatory commitment should be captured in a PassPort[®] AR, a Nuclear Task Management should be initiated, and appropriate actions to implement regulatory commitments should be captured in a PassPort[®] Action Tracking Assignment. The Assignment type is usually entered as “COMM,” which indicates that this action is a commitment. Also, entered are the due date and the responsible individual for meeting the commitment.

The NRC staff reviewed documentation generated by the licensee related to the sample items listed in the attached table that are categorized as commitments in response to different categories of documents, in order to assess the implementation of the regulatory commitment, including the completion status. For the sample of commitments selected for the audit, the NRC staff found that the licensee had adequately captured all of the regulatory commitments in their PassPort[®] system, which is a data management and tracking tool. The review of the sample commitments in the PassPort[®] database reflected their status consistent with the commitment

program. The attached Audit Summary table provides details of the audit and its results.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in NEI 99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at BSEP is contained in the PEC Standard Procedure REG-NGGC-0110. The audit reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC. The audit also verifies that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.2.1 Regulatory Commitment Changes Audit Results

The NRC staff reviewed the licensee's procedure REG-NGGC-0110 against NEI 99-04, Revision 0. The REG-NGGC-0110, includes the following statements, which provide guidance to the licensee that is consistent with the intent of NEI 99-04, and ensure that BSEP is appropriately implementing regulatory commitment changes, as well as tracking changes to the commitments:

Once made, Regulatory Commitments shall be considered non-discretionary and shall be changed only as described in REG-NGGC-0110.

Appropriate actions to implement Regulatory Commitments shall be captured in a PassPort[®] Action Tracking Assignment.

Once accepted, any action inherent to the successful implementation of a Regulatory Commitment shall be considered non-discretionary and shall only be changed as described in REG-NGGC-0110.

If it becomes apparent that an Assignment cannot be implemented as described by the due date, the responsible individual/group shall promptly contact the Responsible Licensing Supervisor, or designee, with a proposed revision.

When notified of the need to change a Regulatory Commitment, the Responsible Licensing Supervisor, or designee, shall ensure an Assignment is initiated to the individual/group that includes a Regulatory Commitment Change Evaluation.

The Responsible Licensing Supervisor, or designee, shall review the Regulatory Commitment Change Evaluation, including any necessary supporting documents, and verify the actions that need to be taken based on the results.

As appropriate, the Responsible Licensing Supervisor, or designee, shall record

the basis for authorizing or not authorizing the change, as well as submit docketed correspondence and capture the revised Regulatory Commitment.

The Responsible Licensing Supervisor, or designee, may also authorize revision of the scope or committed date for a Regulatory Commitment based on related correspondence submitted to the NRC.

It may be appropriate to track the reporting of the Regulatory Commitment change(s) consistent with the frequency of the next UFSAR update or biennially.

The Responsible Licensing Supervisor, or designee, shall ensure that any revised Regulatory Commitment, that satisfies the criteria for reportability to the NRC in the Regulatory Commitment Change Evaluation, is included on a summary report of Regulatory Commitment changes which is submitted on a frequency consistent with 10 CFR 50.71(e) UFSAR updates or biennially.

When making changes to procedures or other documents used to implement a Regulatory Commitment, the responsible organization ensures that the changes do not invalidate compliance with the applicable Regulatory Commitment.

When canceling procedures or other documents used to implement a Regulatory Commitment, the responsible organization ensures that the Regulatory Commitment is still being met and is properly referenced in another appropriate document to ensure continued implementation of the Regulatory Commitment.

If the Regulatory Commitment is no longer needed and a change is warranted, the responsible organization may request a change per the guidance in REG-NGGC-0110.

The NRC staff found that REG-NGGC-0110 adequately conforms to the guidance and intent of NEI 99-04 for commitment tracking, the commitment change process, traceability of commitments, and reporting requirements. Regulatory commitment changes are processed and tracked by the Responsible Licensing Supervisor, or designee. The evaluation of any commitment changes is to be done by filling the "Regulatory Commitment Change Evaluation" form in Attachment 3 of the procedure. The NRC staff reviewed this form and found to be consistent with the Commitment Evaluation form in NEI 99-04 with minor differences.

During the audit, the NRC staff reviewed Enclosure 2 of the licensee's letter dated August 24, 2006, which provided a summary of the BSEP regulatory commitment changes for the period of April 1, 2004 to July 2006. This regulatory commitment change reported a change in a regulatory commitment that was originated by a letter from J. W. Spencer (the licensee) to the NRC, "Replay to a Notice of Violation," dated September 30, 1991. During the audit, the NRC staff asked how the above regulatory commitment change was screened. The licensee responded that in accordance with PEC procedure, the screening papers are not retained after reporting to the NRC. The NRC staff found this acceptable since it is consistent with the NEI 99-04 guidance. Discussions with BSEP staff confirmed that REG-NGGC-0110 is being implemented in its entirety at the plant, which further supports the NRC staff's conclusion that regulatory commitments are being handled in accordance with the guidance contained in

NEI 99-04. In addition, the NRC staff reviewed documentation from the licensee related to the sample items discussed above that involved changes to commitments. The NRC staff found that the licensee properly addressed each regulatory commitment change selected for this audit and has implemented an effective program to manage commitment changes.

2.3 Audit Observations and Suggestions

During the audit the NRC staff noticed that:

- (1) PassPort[®] database is used for all plant activities. Unless other information (such as action request number) is available, PassPort[®] is not a friendly tool for identifying regulatory commitments to the NRC by using a search query.
- (2) No AR was assigned to the regulatory commitments prior to the use of the PassPort database. The responsible licensing engineer initiated an AR number if the commitment required a change or an update in its status (not a regulatory commitment change).
- (3) No AR was assigned if the regulatory commitments completion date was the same as the amendment implementation date. The amendments were implemented by revising plant procedures or completing engineering change packages.
- (4) No AR was assigned to the regulatory commitments that were associated with the relief requests. Instead, work orders were assigned and their completion was reported to the NRC by a letter.
- (5) During the audit, the NRC staff and the BSEP licensing engineer noticed that although a regulatory commitment was incorporated into the plant operating manual, 0ENP-16.2, the procedure did not reference the document that contained the regulatory commitment. Also, the change in the procedure was not marked with reference to the regulatory commitment. As a result, the licensing engineer initiated an AR to correct this deficiency (See Item 24 in the attached Summary of Audit Results).

During the audit, the NRC staff and the BSEP licensing engineer discussed ways to improve efficiency and traceability of the regulatory commitments in the PassPort[®] database and the following items were suggested:

- (1) Enter all the NRC regulatory commitments into PassPort[®] (i.e., assign an AR to each regulatory commitment) upon submittal to the NRC, no matter what kind of work should be done for its completion.
- (2) Add "NRC – Commitment" in the description of the AR (Licensee has started using this approach).
- (3) Add a link in the AR to the original documents that contain the regulatory commitment (incorporated in most of the recent ARs).

- (4) Although not discussed in NEI 99-04, consider adding a reference number to the procedures, engineering changes, or other plant documents that are modified/generated because of a regulatory commitment.

3.0 CONCLUSION

The NRC staff concludes that based on the above audit: (1) BSEP has implemented NRC commitments in a timely manner, and (2) BSEP has implemented an effective program for managing NRC commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Bill Murray	Licensing Engineer
Mark Turkel	Licensing Engineer
Lee Grzeck	Licensing Engineer
Gene Atkinson	Supervisor - Licensing and Regulatory Programs

Principal Contributor: Farideh E. Saba

Attachment: Summary of Audit Results

SUMMARY OF AUDIT RESULTS

IMPLEMENTATION OF COMMITMENTS:

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
1	License Amendment	N/A	July 26, 2004 BSEP 04-0098	PEC has verified that a hydrogen monitoring system (i.e., the H2 and O2 Analyzers) capable of diagnosing beyond design-basis accidents is installed at BSEP Units 1 and 2 and is making a regulatory commitment to maintain that capability. The H2 and O2 Analyzers will be included in the Technical Requirements Manual (TRM) for each unit.	90 days from the date of approval of this amendment.	May 17, 2005 Incorporated in TRM Revision 35 for Unit 1 and TRM Revision 29 for Unit 2
2	License Amendment	N/A	July 26, 2004 BSEP 04-0098	PEC has verified that an oxygen monitoring system (i.e., the H2 and O2 Analyzers) capable of diagnosing beyond design-basis accidents is installed at BSEP Units 1 and 2 and is making regulatory commitment to maintain that capability. The H2 and O2 Analyzers will be included in the TRM for each unit.	90 days from the date of approval of this amendment.	May 17, 2005 Incorporated in TRM Revision 35 for Unit 1 and TRM Revision 29 for Unit 2
3	License Renewal Amendment	AR 100627	BSEP 04-0006, 04-0098, and 06-0035 dated 10/18/2004, 12/06/2004, and 03/24/2006	A total of 31 commitments	Prior to the period of extended operation or as noted in the commitment	Incorporated as Chapter 18 into the Updated FSAR (Revision 20) See letter dated 8/24/06

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
4	GL 2003-01	None	August 11, 2003 BSEP 03-0116	PEC will complete inleakage testing, performed in accordance with American Society for Testing and Materials (ASTM) E741, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," and submit the results of this testing.	July 31, 2004	Tracer gas testing results submitted by letter dated July 29, 2004 (ML042170286)
5	GL 2003-01	None	December 9, 2003 BSEP 03-0164	BSEP will submit a proposed license amendment request within six months following approval of TSTF-448. The amendment request will include a new Technical Specification Surveillance Requirement to determine inleakage in accordance with a Control Room Integrity Program. A new section will be added to Technical Specification Section 5.5, "Programs and Manuals," that will specify the scope of the Control Room Integrity Program. The Control Room Integrity Program will rely on the use of tracer gas inleakage testing.	Within 6 months following: approval of TSTF-448, or publication in the Federal Register, of a Consolidated Line Item Improvement for TSTF-448.	License amendment application submitted to NRC by letter dated 7/17/07 (ML072050385)
6	Relief Request	Work Order (WO) Nos. 592811, 595039, 595045, and 595563	November 4, 2004 BSEP04-0146	To ensure the NRC remains promptly informed of examination results for the subject control rod drive (CRD) piping that require the use of an engineering evaluation, PEC will submit the engineering evaluations to the NRC no later than 90 days following completion.	N/A	03/8/2005 (reported to NRC by letter dated July 8, 2005)

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
7	Relief Request	Work Order (WO) Nos. 592811, 595039, 595045, and 595563	November 4, 2004 BSEP04-0146	If a degraded CRD pipe should begin leaking, or defect growth should be observed beyond that considered in the engineering evaluation, as expeditiously as possible, but no later 30 days after leak identification, an ASME Code-compliant mechanical clamping device will be fabricated and installed in accordance with ASME Code Case N-523-2 as a repair, to control leakage, and to further ensure structural integrity.	N/A	03/8/2005 (reported to NRC by letter dated July 8, 2005)
8	License Amendment Request	None	November 17, 2004 PE&RAS 04-104	BSEP will continue to provide to the NRC, for each calendar month, the operating data that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report." This data will be submitted by the last day of the month following the end of each calendar quarter. This commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). To prevent any gaps in the monthly operating statistics and shutdown experience data provided to the NRC, data for all months will be provided using one or both methods (i.e., monthly operating reports and/or CDE).	Upon implementation of the approved amendment.	Monthly Operating Report data already being provided via CDE at the time the license amendment was issued.

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
9	License Amendment Request	None	January 27, 2005 BSEP 05-0008	PEC will incorporate the revised acceptance criterion value of 7.5 percent into the TS Bases for BSEP, Units 1 and 2 in accordance with the Bases Control Program described in TS 5.5.10.	With implementation of the requested amendments.	07/26/2005 Unit 1, TS Bases Rev 42 Unit 2, TS Bases Rev 40
10	License Amendment Request	Engineering Change (EC) No. 61427	August 11, 2005 BSEP 05-0102	The updated Control Room Emergency Ventilation (CREV) filter radiological loading calculation assumes an additional 2-inch of steel plate between the CREV filter and the control room. BSEP will install shielding, consistent with assumptions of this calculation.	Prior to implementation of the proposed amendment on the first BSEP unit.	12/29/2005
11	License Amendment Request	None	August 26, 2006 BSEP 06-0022	CP&L will establish the Technical Specification Bases for LCO 3.0.8, as adopted with the applicable license amendment.	This regulatory commitment will be completed by the implementation date for the license amendment.	05/14/2007 Unit 1, Technical Requirements Manual (TRM) Rev 43 and Unit 2, TRM Rev. 37
12	Pursuant to 10 CFR 20.1705	AR 90245	May 1, 2006 PE&RAS-05-066	Based on satisfactory tests results from applicable pressure drop tests of the various combinations of hose lengths and number and types of connections that are representative of those anticipated to be used, Carolina Power & Light Company will incorporate specific instructions into the respiratory protection program to ensure that the air is supplied to the suit inlet consistent with the conditions for which this equipment was certified.	Prior to first use of this equipment at Brunswick Steam Electric Plant.	03/0/08 BSEP management determined that the Delta Suit will not be implemented at BSEP. However, this RC will remain open for future use.
13	Pursuant to 10 CFR 20.1705	AR 90245	May 1, 2006 PE&RAS-05-066	Carolina Power & Light Company will modify the respiratory protection program to provide	Prior to first use of this equipment at Brunswick Steam Electric Plant.	03/0/08 BSEP management determined that the

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
				<p>training and additional written instructions, as follows:</p> <p>1) Training:</p> <p>a) Revise or develop written lesson plans and train workers on:</p> <p>i) The features of this equipment;</p> <p>ii) How to don, use, and doff this equipment; and</p> <p>iii) Using the built-in escape strips for routine and emergency egress conditions. The training will include appropriate hands-on and classroom instruction and will include actions to be taken by the user in the event of equipment malfunction.</p> <p>b) Provide appropriate training to personnel responsible for implementation of the respiratory protection program to assist in selection, issuance, set-up, and operation of this equipment.</p> <p>2) Provide written instructions for storage, repair, selection, inspection, and use of this equipment:</p> <p>a) Discard this equipment after a single use,</p> <p>b) Do not use in an environment immediately dangerous to life and health,</p> <p>c) Prohibit contact with open flames or grinding/welding sparks,</p> <p>d) Use with an assigned protection factor of 5000,</p> <p>e) Comply with manufacturer's recommendations for shelf-life and storage conditions for this</p>		<p>Delta Suit will not be implemented at BSEP. However, this RC will remain open for future use.</p>

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
				equipment, f) Perform no maintenance or repair, g) Inspect this equipment at or near time of issue for tears, defects in material, presence of required zippers, and integrity of seams and air distribution and exhaust systems, and h) Wearer to perform an operational check after donning and before exposure to airborne contaminants. 3) Provide written instructions for respirator problem identification and communication: a) Identify problems in the Corrective Action Program, b) Communicate with the vendor to investigate and resolve identified problems, and c) Communicate identified problems to other licensees through the Operating Experience Program.		
14	BWRVIP-18A,	AR 200439	JUL 18, 2006 BSEP 06-0073	Perform a repair core spray sparger weld 1-S2a-350.	Unit 1 Refueling Outage B117R1, currently scheduled for March 2008.	04/23/08 by EC No. 66034
15	License Amendment Request	None	September 28, 2006 BSEP 06-0067	In support of the main fuel oil storage tank inspection and cleaning activities, CP&L will establish an implementing procedure to assure that the EDGs will be able to perform their intended safety function when the main fuel oil storage tank is removed from service. This procedure will include the following provisions.	Prior to removing the main fuel oil storage tank from service in accordance with the proposed Condition A of Technical Specification (TS) 3.8.3.	Procedure OSP-07-007 issued 10/1/07 (procedure expires 10/1/08)

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
				<ul style="list-style-type: none">• Fuel oil removed from the main fuel oil storage tank will be readily available to replenish the 4-day tanks or supply the diesel driven fire pump should the need arise.• Elective maintenance and testing (i.e., including performance of routine surveillances), that affects EDG operability, will not be permitted when the main fuel oil storage tank is out-of-service for inspection, cleaning or repairs.• Switchyard activities and other on-site electrical maintenance that could cause any unstable offsite or on-site power conditions will not be scheduled while the main fuel oil storage tank is removed from service.• Removal of the main fuel oil storage tank from service will not be permitted when severe weather is forecast for the area or if there is a foreseen need for EDG operation.• Restoration of the main fuel oil storage tank will be pursued in an expeditious manner in the event that long-term EDG operation is required.		

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
16	License Amendment Request		September 28, 2006 BSEP 06-0067	With the main fuel oil storage tank out-of-service, re-supply fuel for the fire pump will require use of temporary hoses from the temporary on-site storage location. Appropriate procedural controls and training will be developed to ensure adequate fuel oil inventory to the diesel driven fire pump from alternate supplies.	Prior to removing the main fuel oil storage tank from service in accordance with the proposed Condition A of TS 3.8.3.	10/01/2007 Plant Operating Manual Volume XC, Special Procedure OSP-07-007. This procedure will expire on 10/0/2008
17	GL 2008-01	AR 283500	May 9, 2008 BSEP 08-0060	CP&L will complete detailed walkdowns and any necessary ultrasonic examinations of inaccessible piping at locations potentially susceptible to gas accumulation for systems within the scope of Generic Letter (GL) 2008-01 for Brunswick Steam Electric Plant (BSEP) Unit 2, prior to startup from the next refueling outage (i.e., B219R1).	Prior to startup from the B219R1 refueling outage, currently scheduled to begin on February 28, 2009.	In progress
18	GL 2008-01	AR 283500	May 9, 2008 BSEP 08-0060	CP&L will submit a supplemental response to GL 2008-01 within 90 days following the completion of the B219R1 refueling outage. The supplemental response will describe any changes to the nine-month response resulting from walkdowns and ultrasonic examination of inaccessible BSEP Unit 2 piping.	Within 90 days following the completion of the B219R1 refueling outage, currently scheduled to end on April 11, 2009.	In progress

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
19	GL 2008-01	AR 283500	May 9, 2008 BSEP 08-0060	CP&L will complete any necessary ultrasonic examinations or additional inspections of inaccessible piping at locations potentially susceptible to gas accumulation for systems within the scope of GL 2008-01 for BSEP Unit 1 prior to startup from the next refueling outage (i.e., B118R1).	Prior to startup from the B118R1 refueling outage, currently scheduled to begin on February 27, 2010.	In progress
20	GL 2008-01	AR 283500	May 9, 2008 BSEP 08-0060	CP&L will submit a supplemental response to GL 2008-01 within 90 days following the completion of the B118R1 refueling outage. The supplemental response will describe any changes to the nine-month response resulting from walkdowns and ultrasonic examination of inaccessible BSEP Unit 1 piping.	Within 90 days following the completion of the B118R1 refueling outage, currently scheduled to end on April 5, 2010.	In progress
21	License Amendment Request	AR 266789	June 19, 2008 BSEP 08-0082	CP&L will establish the Technical Specification Bases for TS B 3.1.3 and TS B 3.1.4 consistent with those provided Enclosure 5.	To be implemented with in implementation of the amendment.	In progress
22	Operator License	AR 266554	December 14, 2007 BSEP 07-0140	The individual holding Operating License SOP-2371-1 (Docket No. 55-21784) will complete the requalification training program as outlined in 10 CFR 50.59(a)	After the individual holding Operating License SOP-2371-1 (Docket No. 55-21784) resumes meeting ANSI/ANS 3.4 medical qualifications standards.	In progress
23	Operator License	AR 266554	December 14, 2007 BSEP 07-0140	Notify the NRC the individual holding Operating License SOP-2371-1 (Docket No. 55-21784) has completed the license operator requalification training program.	Within 30 days following completion of the requalification training program.	In progress

No.	Category	Action Request No.	Letter Date No.	Commitment	Scheduled Date	Completion Date
24	Follow up to Relief Request	AR 284073 ⁽¹⁾ AR 284851 ⁽²⁾	February 19, 2001 BSEP 01-0012	The inspection frequency and scope of Category A, B, C, D, and E stainless steel piping welds will be in accordance with the BWRVIP-75 guidelines for normal water chemistry (NWC), as revised by the NRC Safety Evaluation dated September 15, 2000.	Beginning with the BSEP, Unit 2 refueling outage scheduled to start February 24, 2001.	Revised plant operating manual 0ENP-16.2 (Incorporated by Revision 13 on 11/21/01)

(1) AR 284073 was originated on 06/19/2008 to correct a deficiency which was identified by the BSEP inservice inspection manager.

(2) AR 284851 was originated on 06/25/2008 during the NRC's audit to address missing reference to the regulatory commitment in the revised procedure.