



# Progress Energy

DEC 16 2010

TSC-2010-01 & TSC-2010-02

10 CFR 50.90

SERIAL: BSEP 10-0141

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2  
Renewed Facility Operating License Nos. DPR-71 and DPR-62  
Docket Nos. 50-325 and 50-324  
Response to Request for Additional Information Regarding License  
Amendment Requests for Addition of Analytical Methodology Topical  
Reports to Technical Specification 5.6.5 (NRC TAC Nos. ME3856,  
ME3857, ME3858, and ME3859)

## References:

1. Letter from Michael J. Annacone to the U.S. Nuclear Regulatory Commission (Serial: BSEP 10-0052), "Request for License Amendments - Addition of Analytical Methodology Topical Report to Technical Specification 5.6.5, "Core Operating Limits Report (COLR)," dated April 29, 2010 (ADAMS Accession Number ML101310388)
2. Letter from Michael J. Annacone to the U.S. Nuclear Regulatory Commission (Serial: BSEP 10-0057), "Request for License Amendments - Addition of Analytical Methodology Topical Report to Technical Specification 5.6.5, "Core Operating Limits Report (COLR)," dated April 29, 2010 (ADAMS Accession Number ML101310389)

## Ladies and Gentlemen:

By letters dated April 29, 2010 (i.e., References 1 and 2), Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requested license amendments to revise the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments revise Technical Specification 5.6.5.b by adding: (1) AREVA Topical Report ANP-10298PA, *ACE/ATRIUM 10XM Critical Power Correlation*, Revision 0, March 2010, and (2) AREVA Topical Report BAW-10247PA, *Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors*, Revision 0, April 2008, to the list of analytical methods that have been reviewed and approved by the NRC for determining core operating limits.

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

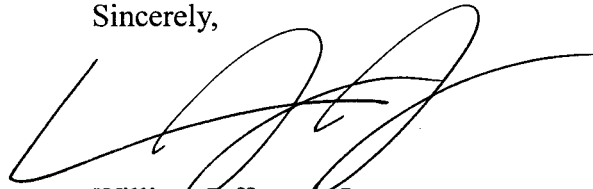
A001  
NRC

On November 18, 2010, the NRC provided, via electronic mail, a request for additional information concerning the referenced license amendment requests. The response to this request is enclosed.

No regulatory commitments are contained in this letter. Please refer any questions regarding this submittal to Mr. Lee Grzeck, Acting Supervisor - Licensing/Regulatory Programs, at (910) 457-2487.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on December 16, 2010.

Sincerely,



William Jefferson, Jr.  
Director – Site Operations  
Brunswick Steam Electric Plant

WRM/wrm

Enclosures:

1. AREVA Report ANP-2978P, Revision 0, *AREVA Responses to RAIs on the ATRIUM 10XM Compliance Audit and Brunswick LARs*, dated December 2010 **(Proprietary Information – Withhold from Public Disclosure in Accordance With 10 CFR 2.390)**
2. AREVA Affidavit Regarding Withholding ANP-2978P, Revision 0, from Public Disclosure
3. AREVA Report ANP-2978NP, Revision 0, *AREVA Responses to RAIs on the ATRIUM 10XM Compliance Audit and Brunswick LARs*, dated December 2010

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cc (with Enclosures 1, 2, and 3):

U. S. Nuclear Regulatory Commission, Region II  
ATTN: Mr. Luis A. Reyes, Regional Administrator  
245 Peachtree Center Ave, NE, Suite 1200  
Atlanta, GA 30303-1257

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Philip B. O'Bryan, 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

cc (with Enclosures 2 and 3 only):

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

Mr. W. Lee Cox, III, Section Chief  
Radiation Protection Section  
North Carolina Department of Environment and Natural Resources  
1645 Mail Service Center  
Raleigh, NC 27699-1645

AREVA Affidavit Regarding Withholding  
ANP-2978P, Revision 0,  
from Public Disclosure

A F F I D A V I T

STATE OF WASHINGTON    )  
                                       ) ss.  
COUNTY OF BENTON        )

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in the report ANP-2978P Revision 0, entitled, "AREVA Responses to RAIs on the ATRIUM 10XM Compliance Audit and Brunswick LARs," dated December 2010 and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

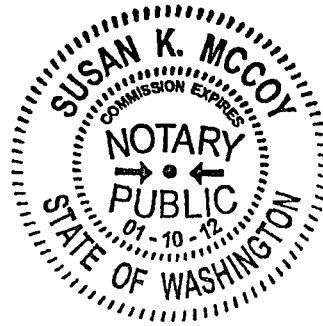
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Alex McCoy

SUBSCRIBED before me this 10th  
day of December, 2010.

Susan K McCoy

Susan K. McCoy  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 1/10/12



AREVA Report ANP-2978NP, Revision 0,  
*AREVA Responses to RAIs on the ATRIUM 10XM  
Compliance Audit and Brunswick LARs,*  
dated December 2010