



Progress Energy

JAN 27 2011

Serial: BSEP 11-0010

10 CFR 26.9

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
Revised Environmental Assessment - Request for Exemption from Certain
Requirements of the Fitness for Duty Rule for Managing Fatigue
(NRC TAC Nos. ME5188 and ME5189)

Reference: Letter from Phyllis N. Mentel to the U.S. Nuclear Regulatory Commission
(Serial: BSEP 10-0111); "Request for Exemption from Certain
Requirements of the Fitness for Duty Rule for Managing Fatigue," dated
December 16, 2010 (ADAMS Accession Number ML103630405)

Ladies and Gentlemen:

In a letter dated December 16, 2010, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requested an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. This submittal provides a revised Environmental Assessment for the December 16, 2010, exemption request. The enclosure to this letter provides the revised assessment.

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

Sincerely,

Phyllis N. Mentel
Manager - Support Services
Brunswick Steam Electric Plant

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NRH

MAT/mat

Enclosure:

Revised Environmental Assessment

cc (with enclosure):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Victor M. McCree, Regional Administrator
245 Peachtree Center Avenue, 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

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

Revised Environmental Assessment

Background

In a letter dated December 16, 2010 (i.e., ADAMS Accession Number ML103630405), Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requested an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. As a result of conversations with the NRC, CP&L is providing the following revised Environmental Assessment of the requested exemption. This assessment replaces, in its entirety, the Environmental Assessment provided in the December 16, 2010, submittal.

Environmental Assessment

CP&L is requesting an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue for BSEP, Unit Nos. 1 and 2. Specifically, CP&L is requesting an exemption from the requirements of 10 CFR 26.205(c) and (d) for meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane force winds. The following information is provided in support of an environmental assessment and finding of no significant impact for the proposed exemption.

- (1) The proposed exemption is administrative in nature and is limited to allowing a temporary exemption from meeting the requirements of 10 CFR 26.205(c) and (d) during storm crew activation in response to tropical storm or hurricane force winds threatening the site, to ensure that work hour controls do not impede the ability to use whatever staff resources may be necessary to respond to a severe weather threat. The proposed exemption does not involve any physical changes to the facility and does not alter the design, function, or operation of any plant equipment. Therefore, issuance of this exemption does not significantly increase the probability or consequences of an accident previously evaluated.
- (2) The proposed exemption is administrative in nature and is limited to allowing a temporary exemption from meeting the requirements of 10 CFR 26.205(c) and (d). The proposed exemption does not make any changes to the facility and would not create any new accident initiators. The proposed exemption does not alter the design, function, or operation of any plant equipment. Therefore, this exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The proposed exemption is administrative in nature and is limited to allowing a temporary exemption from meeting the requirements of 10 CFR 26.205(c) and (d). The proposed exemption does not alter the design, function, or operation of any plant equipment. Therefore, this exemption does not involve a significant reduction in the margin of safety.

Based on the above, CP&L concludes that the proposed exemption does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c).

CP&L has also determined that the exemption involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite; that there is no significant increase in individual or cumulative public or occupational radiation exposure; that there is no significant construction impact; and there is no significant increase in the potential for or consequences from a radiological accident. Furthermore, the requirements from which CP&L will be exempted involve work hour scheduling requirements. Accordingly, the exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the exemption request.