



Progress Energy

APR 13 2011

Serial: BSEP 11-0041

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 Proposed
Exemption from Certain Requirements of the Fitness for Duty Rule for
Managing Fatigue (NRC TAC Numbers ME5188 and ME5189)

- References:
1. Letter from Phyllis N. Mentel to U.S. Nuclear Regulatory Commission, *Request for Exemption from Certain Requirements of the Fitness for Duty Rule for Managing Fatigue*, dated December 16, 2010, ADAMS Accession Number ML103630405
 2. Letter from Phyllis N. Mentel to U.S. Nuclear Regulatory Commission, *Response to Request for Additional Information Regarding Proposed Exemption from Certain Requirements of the Fitness for Duty Rule for Managing Fatigue (NRC TAC Numbers ME5188 and ME5189)*, dated March 7, 2011, ADAMS Accession Number ML110730275

Ladies and Gentlemen:

By letter dated December 16, 2010 (i.e., Reference 1), 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. On March 7, 2011 (i.e., Reference 2), CP&L responded to a request for additional information (RAI) regarding the December 16, 2010, request.

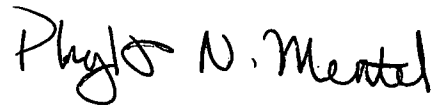
On April 5, 2011, via electronic mail, the NRC provided a RAI on this topic. The response to the April 5, 2011, RAI is provided in the enclosure to this letter.

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NRR

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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.

Sincerely,

A handwritten signature in black ink that reads "Phyllis N. Mentel". The signature is written in a cursive style with a large initial "P".

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

MAT/mat

Enclosure:

Response to Request for Additional Information

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cc (with enclosure):

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U. S. Nuclear Regulatory Commission
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U. S. Nuclear Regulatory Commission **(Electronic Copy Only)**
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Mr. W. Lee Cox, III, Section Chief
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Response to Request for Additional Information

By 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. On March 7, 2011, CP&L responded to a request for additional information (RAI) regarding the December 16, 2010, request.

On April 5, 2011, via electronic mail, the NRC provided a RAI on this topic. The response to the April 5, 2011, RAI follows.

NRC Question

Carolina Power and Light Company (the licensee) submitted an exemption request dated December 16, 2010 (ML103630405) for Brunswick Steam Electric Plant (BSEP) Unit 1 and 2 from certain requirements of Title 10 of the Code of Federal Regulations (10 CFR) Part 26 "Fitness for Duty Programs," paragraphs 26.205(c) and (d) from meeting work hour controls during severe weather conditions involving tropical storm or hurricane force winds. The licensee in its letter dated March 07, 2011, provided a response to the NRC staff request for additional information. The licensee in its response to the NRC's question 1 included a phrase that states "reset their work hour clock". This phrase is not otherwise defined in Part 26 or the exemption request. Please clarify the meaning of the phrase "reset their work hour clock."

CP&L Response

The section in question deals with the criteria which will be considered when making the determination to resume work hour controls. The sentence in question states:

Adequate personnel, both onsite and from relief crews, are available (e.g., return of employees to the area, safe access to the site, ability to implement the emergency plan, sufficient number of qualified personnel, etc.) and they have had sufficient time off to reset their work hour clock.

An individual's work hour clock is considered reset when they have had a minimum of a 10-hour break prior to the start of the first shift following exiting the exemption. The minimum day off requirements of 10 CFR 26.205(d)(3) will be considered reset and the forward shift schedules must be designed to meet the minimum day-off requirements.