



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 12, 2011

LICENSEES: CAROLINA POWER & LIGHT COMPANY AND FLORIDA POWER CORPORATION

FACILITIES: Brunswick Steam Electric Plant, Units 1 and 2; Crystal River Nuclear Generating Plant, Unit 3; and H. B. Robinson Steam Electric Plant, Unit 2

SUBJECT: SUMMARY OF APRIL 12, 2011, PREAPPLICATION MEETING WITH CAROLINA POWER & LIGHT COMPANY AND FLORIDA POWER CORPORATION, ON BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2; CRYSTAL RIVER NUCLEAR GENERATING PLANT, UNIT NO. 3; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2, TRANSITION TO NFPA 805 REQUIREMENTS

On April 12, 2011, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and Progress Energy, representing Carolina Power & Light Company and Florida Power Corporation (the licensees) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the preapplication meeting was to discuss the transition to the requirements of the National Fire Protection Association Standard 805 (NFPA 805) pursuant to Section 50.48(c) of Title 10 of *Code of Federal Register* (10 CFR) for Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (Brunswick); Crystal River Nuclear Generating Plant, Unit No. 3 (Crystal River); and, H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson). The licensees provided a slide presentation prior to the meeting to help facilitate the discussion (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11102A005). This document was linked to the meeting notice posted on the NRC's website in advance the meeting (ADAMS Accession No. ML110840631). A list of attendees is enclosed.

Following the administrative and introductory meeting portions, Alex Klein, Chief of NRC's Office of Nuclear Reactor Regulation (NRR) Fire Protection Branch, started the meeting by providing background information on NFPA 805 and referring to the previous meeting held on February 9, 2011 (ADAMS Accession No. ML110590918). He also referred to an upcoming meeting with the Nuclear Energy Institute on April 14, 2011, that would discuss the sequence of the NFPA 805 license amendment submittals and the staggered review by the NRC staff.

Jeff Ertman, Progress Energy's NFPA 805 Project Manager, began the licensee's presentation by providing an NFPA 805 fleet submittal schedule (page 2 of the slides). Current license amendment requests (LARs) submittals scheduled are: Crystal River initial submittal in June 2011 with one supplement in the third quarter of 2011; Robinson initial submittal in June 2011 with two supplements in the first and third quarters of 2012; and Brunswick initial submittal in October 2011 with one supplement in the first quarter of 2012. Current target modification completion date for all three plants is 2014. Samson Lee, Deputy Director of NRR's Division of Risk Assessment, commented that submitting planned supplements is not a preferred approach for the NRC and may not pass the acceptance review instructions under NRR's LIC-109, "Acceptance Review Procedures." Progress Energy continued by presenting fleet target modification completion dates, project organization, strength and challenges regarding the

NFPA 805 project. During the meeting, the Progress Energy attendees presented and discussed the fleet and site-specific slides. Additional information was provided by the licensee's personnel on the conference call for each site, as needed.

Progress Energy discussed its fleet strength by pointing out at the fleet level variances from deterministic requirements and compensatory measures that address multiple spurious operations and operators manual actions issues are in place. Also, incorporation of lessons-learned and processes from pilot plants, such as the Shearon Harris Nuclear Power Plant (HNP, which is part of the Progress Energy fleet) and Oconee Nuclear Station, and use of the LAR template for the remaining plants are considered as a fleet strength. Progress Energy added that they are not waiting for the NRC staff approval of the LARs to schedule modifications, and many modifications at Robinson and Crystal River are already scheduled and completed.

Progress Energy provided insights regarding its fleet level challenges. Progress Energy stated that most of the work is performed with internal resources that may be impacted by the resources challenges because of emergent plant or industry issues. There is also a continual competition for external resources, particularly in the areas of probabilistic risk assessment and safe shutdown analysis. Other fleet challenges include the first NFPA 805 post-transition triennial inspection, other triennial inspections in 2011, and plant outages.

After the fleet discussions, Progress Energy provided site-specific updates. It provided an update for each site regarding scope and status, plant specific issues, projected modifications, challenges, and impact on safety. During the meeting, Progress Energy, in response to the NRC inquiries, provided the status of steps in NFPA 805 prioritization philosophy for each plant.

At Crystal River, modifications are projected and in progress. The solution for being in compliance is both deterministic and performance based, similar to HNP. The licensee is planning to submit its LAR for the extended power uprate (EPU) in June 2011. The Crystal River EPU and NFPA 805 LARs will be independent. However, the NFPA 805 LAR will describe modifications under post-EPU LAR. The fire impacts will be considered in the EPU internal and external events. Another challenge specific to Crystal River is that, due the containment delamination, it has been in an extended outage since September 2009. The Progress Energy personnel on the conference call supported the Crystal River plant-specific discussions.

At Brunswick, the current target is one submittal in October 2011 with one supplement for nonpower operations. The licensee has not identified any specific open items. The plant-specific challenges include a dual-unit plant with cross-unit power supply, many previously approved Appendix R, III.G.3 areas, and shortage of internal resources.

At Robinson, the current LAR target is June 2011, with two supplements in 2012. It appears that if Robinson submits its NFPA 805 LAR as scheduled, it will not pass a sufficiency review of the NRC's acceptance process (LIC-109). The licensee previously requested an extension of its original enforcement discretion to August 2012. However, the NRC staff responded that at that time, the staff was not authorized to grant the request. Many NFPA 805 modifications are projected for the Robinson plant. Modifications will not be impacted by the LAR submittal or the NRC review dates. The Progress Energy personnel on the conference call also supported the Robinson plant-specific discussions.

At the conclusion of the meeting, Progress Energy stated that it will monitor NRC's approval of staggered approach to reviewing staggered reviewing of NFPA 805 applications and it will keep the respective NRC plant project managers up to date on any changes to the LAR submittal schedule as discussed during the meeting.

Members of the public were in attendance and on the phone. Public Meeting Feedback forms were distributed, but no comments were received.

Please direct any inquiries to me at 301-415-1447 or [farideh.saba@nrc.gov](mailto:farideh.saba@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "Farideh E. Saba". The signature is written in a cursive style with a long horizontal stroke at the end.

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

Docket Nos. 50-325, 50-324,  
50-302, 50-261, and 50-400

Enclosure: List of Attendees

cc w/encl: Distribution via ListServ

LIST OF ATTENDEES

April 12, 2011

MEETING WITH PROGRESS ENERGY

TRANSITION TO NFPA-805 LICENSE AMENDMENT REQUESTS

Nuclear Regulatory Commission

S. Laur  
A. Klein  
S. Lee  
S. Dinsmore  
D. Pickett  
P. Lain  
D. Harrison  
J. Robinson  
F. Saba

Public – call in

P. Bradley  
M. Lilley  
N. Tyler  
P. Mazzaferro  
P. Barbadoro  
W. Cross  
C. Sly

Progress Energy.

K. Heffner  
D. Miskiewicz  
K. Lavin  
J. Ertman

Progress Energy – call in

F. Modlin  
S. Thomposon  
B. Gerwe  
J. Linger  
W. Murray  
J. Becker  
J. Caves  
J. Curham  
T. Howard  
C. Kish  
P. Kannapel

Nuclear Energy Institute

T. Basso

Enclosure

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*/RA/*

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

Docket Nos. 50-325, 50-324,  
50-302, 50-261, and 50-400

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ADAMS Accession No. PKG ML11116A016 Notice ML110840631 Summary ML11116A020 Handouts MI11102A005

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OFFICE	DRA/AFP/BC	DORL/LPL2-2/BC	DORL/LPL2-2 /PM	
NAME	AKlein	DBroaddus (CGratton for)	FSaba	
DATE	5/11/11	5/12/11	05/12/11	

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