

Michael J. Annacone Vice President Brunswick Nuclear Plant

June 8, 2011

Serial: BSEP 11-0061

10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk 11555 Rockville Pike Rockville, MD 20852

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 Required 30-Day Response to NRC Bulletin 2011-01, "Mitigating Strategies"

Reference: NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011

Ladies and Gentlemen:

Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., hereby submits the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, required 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies." The bulletin required licensees to provide information, within 30-days of the date of the bulletin, confirming continued compliance with 10 CFR 50.54(hh)(2) regarding: (1) the availability and capability of equipment necessary to execute mitigating strategies to perform its intended function, as described in licensee submittals to the NRC, and (2) the capability of implemented guidance and strategies to be executed considering current facility configuration and current staffing and skill levels of the staff.

The enclosure to this letter contains the required 30-day response to the requested information pursuant to the provisions of 10 CFR 50.54(f) for BSEP, Unit Nos. 1 and 2.

This submittal contains no proprietary, sensitive, safeguards, or classified information. 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.

AIHLA

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 8^{th} day of June 2011.

Sincerely,

Elm & Wills

Michael J. Annacone

LJG/ljg

Enclosure: Required 30-Day Response to NRC Bulletin 2011-01 for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2

cc:

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

Required 30-Day Response to NRC Bulletin 2011-01 for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies." The NRC issued this Bulletin to achieve the following objectives:

- 1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2),
- 2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
- 3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

Bulletin 2011-01 requested that, within 30 days of the date of this Bulletin, licensees provide information on their mitigating strategies programs. The NRC questions related to the required 30-day response are restated below, followed by the Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., response for the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2.

1. Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

CP&L Response

CP&L has confirmed that the equipment necessary to execute the mitigating strategies, as described in our submittals to the NRC (i.e., References 1 - 7) and as reviewed and approved by the NRC (i.e., Reference 8), is available and capable of performing its intended function at BSEP, Unit Nos. 1 and 2.

2. Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

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CP&L Response

CP&L has confirmed that the guidance and strategies implemented at BSEP, Unit Nos. 1 and 2, are capable of being executed considering the current configuration of the facility and current staffing and skill levels of the BSEP personnel.

<u>References</u>

- Letter from Edward T. O'Neil, Manager-Support Services, Brunswick Steam Electric Plant, to U.S. Nuclear Regulatory Commission, "Response to February 25, 2005, NRC Letter, Subject: NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b," dated May 31, 2005.
- Letter from Edward T. O'Neil, Manager-Support Services, Brunswick Steam Electric Plant, to U.S. Nuclear Regulatory Commission, "Response to NRC Letter dated November 2, 2005, Request for Additional Information Regarding the February 2002, Order Section B.5.b, for Brunswick, Crystal River, Shearon Harris, and Robinson Nuclear Plants," dated December 13, 2005.
- Letter from James Scarola, Vice President, Brunswick Steam Electric Plant, to James E. Dyer, Director-Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, "Response to NRC Letter Dated December 2, 2005, Demand for Information: Brunswick Steam Electric Plant, Unit 1 & 2," dated January 20, 2006.
- Letter from Edward T. O'Neil, Manager-Support Services, Brunswick Steam Electric Plant, to U.S. Nuclear Regulatory Commission, "Response to NRC Letter dated January 25, 2006, Brunswick Station - Report of Inspection of Nuclear Reactor Safeguards Interim Compensatory Measure - Section B.5.b, Temporary Instruction 2515/164 NRC Inspection Report 2005-009," dated February 23, 2006.
- Letter from James Scarola, Vice President, Brunswick Steam Electric Plant, to U.S. Nuclear Regulatory Commission, "Response Providing Information Regarding Implementation Details for the B.5.b Phase 2 and 3 Mitigation Strategies," dated February 9, 2007.

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- 6. Letter from James Scarola, Vice President, Brunswick Steam Electric Plant, to U.S. Nuclear Regulatory Commission, "Supplemental Response Providing Information Regarding Implementation Details for the B.5.b Phase 2 and 3 Mitigation Strategies," dated May 11, 2007.
- Letter from Philip A. Leich, Manager Support Services, Brunswick Steam Electric Plant, to U.S. Nuclear Regulatory Commission, "Report of 10 CFR 50.59 Evaluations and Commitment Changes," dated August 20, 2008.
- Letter from Stewart N. Bailey, Senior Project Manager, U.S. Nuclear Regulatory Commission, to James Scarola, Vice President, Brunswick Steam Electric Plant, "Brunswick Steam Electric Plant, Units 1 and 2 – Conforming License Amendments to Incorporate the Mitigation Strategies Required by Section B.5.B. of Commission Order EA-02-026 and the Radiological Protection Mitigation Strategies Required by Commission Order EA-06-137 (TAC Nos. MD4516 and MD4517)," dated August 9, 2007.