



Progress Energy

JUN 23 2011

Serial: BSEP 11-0069

U. S. Nuclear Regulatory Commission
ATTN: Cindy K. Bladey, Chief, Rules, Announcements, and Directives Branch
Division of Administrative Services, Office of Administration (MS: TWB-05-B01M)
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
Comments Regarding Draft Branch Technical Position 8-8
Docket ID NRC-2011-0119

Dear Ms. Bladey:

Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., appreciates the opportunity to review the draft Branch Technical Position (BTP) 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Time Extensions." The availability for comment was issued in the *Federal Register* on May 31, 2011 (i.e., 76 FR 31381). CP&L has reviewed the draft BTP, which provides guidance regarding the scope and content of amendment requests to extend the Completion Time for an inoperable emergency diesel generator to 14 days. The enclosure to this submittal contains comments on the draft BTP from the Brunswick Steam Electric Plant, Units Nos. 1 and 2.

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

MAT/mat

Enclosure: Comments on Draft Branch Technical Position 8-8

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Ms. Cindy K. Bladey, Chief, Rules, Announcements, and Directives Branch
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Comments on Draft Branch Technical Position 8-8

The NRC solicited comments on draft Branch Technical Position (BTP) 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Time Extensions," in the *Federal Register* on May 31, 2011 (i.e., 76 FR 31381). CP&L has reviewed the draft BTP, which provides guidance regarding the scope and content of amendment requests to extend the Completion Time for an inoperable emergency diesel generator (EDG) to 14 days. Comments from the Brunswick Steam Electric Plant (BSEP), Units Nos. 1 and 2, are provided below.

Background (Section A), last paragraph states, in part:

NRC staff has been receiving license amendments requesting one-time or permanent extensions for the EDGs and offsite power sources AOT from the current 72 hours to 7-14 days to perform online maintenance of EDGs and offsite power sources.

Comment 1:

Based on the sentence, as written, the BTP is addressing only plants requesting Allowed Outage Time (AOT) extensions from 72-hours to 7-14 days. It is suggested that the sentence be revised to address AOT extensions up to 14 days; regardless of whether the current AOT is 72 hours or 7 days.

Comment 2:

Provide discussion that unplanned maintenance activities are not restricted from use of the extended AOT.

Branch Technical Position (Section B), second paragraph states, in part:

The staff's objective of requiring an extra (i.e., supplemental) power source for an inoperable EDG or offsite power source is to avoid a potential Station Blackout (SBO) event during the period of extended AOT and to enable safe shutdown (cold shutdown) of the unit if normal power sources cannot be restored in a timely manner.

Comment 3:

The supplemental power source would not avoid a potential SBO event, since it is not required to automatically start and load. Rather, it would be available within 1 hour to substitute for an inoperable EDG to mitigate an SBO event.

Branch Technical Position (Section B), tenth paragraph (i.e., commitments) states, in part:

Additionally, the staff expects that the licensee will provide the following Regulatory Commitments:

- *The extended AOT will be used no more than once in a 24 months period (or refueling interval) to perform EDG maintenance activities, or any major maintenance on offsite power transformer and bus.*

Comment 4:

It is suggested that this commitment be deleted.

The proposed commitment, as written, is ambiguous and overly restrictive. Since it is not written on a "per diesel" basis, it could be interpreted that, for a single unit plant with two EDGs, it would take four years to complete major overhaul of the two EDGs. Additionally, since it is not specific to planned maintenance, it would restrict the application to unplanned EDG outages as well.

As part of the license amendment request for an extended AOT, the licensee provides the reason for the AOT extension and the planned maintenance activities to be performed. From this information, the NRC is able to conclude whether the planned maintenance interval for an EDG is acceptable or not. Furthermore, the request will be accompanied by Probabilistic Risk Assessment (PRA) perspectives which support the intended planned maintenance interval. Additionally, insights such as a permanent supplemental diesel installation versus a temporary diesel installation would support more frequent planned maintenance.

Existing limitations on EDG unavailability make it unnecessary to commit to restrictions on the usage of the AOT. NRC performance indicators track EDG unavailability. Additionally, the Maintenance Rule establishes limitations on EDG unavailability. It is not necessary to place restrictions on the use of Technical Specification AOTs to ensure the appropriate level of EDG availability

Branch Technical Position (Section B), eleventh paragraph (i.e., following commitments) states, in part:

Therefore, a supplemental power source must be available when extending the AOT for a single inoperable EDG or offsite power source beyond the current 3 days (72 hours).

Comment 5:

Based on the sentence, as written, the BTP is addressing only plants requesting AOT extensions from 72-hours. It is suggested that the sentence be revised to address AOT extensions up to 14 days; regardless of whether the current AOT is 72 hours or 7 days.

References (Section C), References 2 and 3:

2. *RG 1.174, November 2002, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis"*
3. *RG 1.177, August 1998, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications"*

Comment 6:

References 2 and 3 should be the current revisions of Regulatory Guide (RG) 1.177 and RG 1.174, issued in May 2011.