



411 Fayetteville Street Mall  
Raleigh NC 27602

10 CFR 2.202  
10 CFR 50.4

Serial: RA-12-016  
April 2, 2012

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT  
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1  
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

**CAROLINA POWER & LIGHT COMPANY AND FLORIDA POWER  
CORPORATION'S ANSWER TO MARCH 12, 2012, COMMISSION ORDER  
MODIFYING LICENSES WITH REGARD TO RELIABLE SPENT FUEL POOL  
INSTRUMENTATION (ORDER NUMBER EA-12-051)**

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately) ("Order") to, *inter alia*, Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC). The orders state that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC has decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically, the NRC is requiring additional defense-in-depth measures to address uncertainties associated with protection from beyond-design-basis external events. With respect to this Order, licensees are specifically directed to provide a reliable means of remotely monitoring "wide-range spent fuel pool levels" to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan, including a description of how compliance with the requirements described in Attachment 2 will be achieved, to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires

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full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

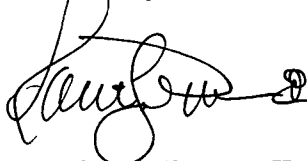
Pursuant to 10 CFR 2.202 and the terms specified in the Order, CP&L and FPC hereby submit their answer to the Order. CP&L and FPC consent to the Order and do not request a hearing. Based on information currently available, CP&L and FPC have not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, CP&L and FPC have not identified any impediments to compliance with the Order within two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever is earlier. CP&L and FPC will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of CP&L and FPC to comply with the specific compliance deadline dates based on the probable availability of that guidance, CP&L and FPC's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

This letter contains no new commitments.

If you have any questions or require additional information, please contact Donna Alexander, Manager, Nuclear Regulatory Affairs, at (919) 546-5357.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on April 2, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Duncan II", with a stylized flourish at the end.

Robert J. Duncan II  
Vice President – Nuclear Operations  
Progress Energy, Inc.

DBM

cc: USNRC Region II  
USNRC Director, Office of Nuclear Reactor Regulation  
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2  
USNRC Resident Inspector – CR3  
USNRC Resident Inspector – SHNPP, Unit No. 1  
USNRC Resident Inspector – HBRSEP, Unit No. 2  
F. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3  
A. T. Billoch Colón, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2