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

June 8, 2012

Mr. Michael J. Annacone
Vice President
Brunswick Steam Electric Plant
Carolina Power & Light Company
Post Office Box 10429
Southport, NC 28461

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 - REVIEW OF 60-DAY RESPONSE TO REQUEST FOR INFORMATION REGARDING RECOMMENDATION 9.3, OF THE NEAR-TERM TASK FORCE RELATED TO THE FUKUSHIMA DAIICHI NUCLEAR POWER PLANT ACCIDENT (TAC NOS. ME8608 AND ME8609)

Dear Mr. Annacone:

By letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC or Commission) issued a Request for Information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) which included the Near Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness (EP). Specifically, licensees were requested to assess their means to power communications equipment onsite and offsite during a prolonged Station Blackout event and to perform a staffing study to determine the staff required to fill all necessary positions in response to a multi-unit event. If a licensee could not meet the requested 90-day response, then that licensee was required to provide a response within 60 days of the issuance of the NRC's letter describing an alternative course of action and estimated completion date.

By letter dated May 9, 2012, Carolina Power & Light Company, (the licensee), submitted its 60-day response proposing an alternative course of action based upon the higher priority to complete the implementation of the revised EP Rule. As discussed in the enclosed NRC staff evaluation, the licensee's alternative approach outlined in its 60-day response letter is consistent with Commission direction and is consistent with the guidance of industry documented in Nuclear Energy Institute (NEI) 12-01, "Guidance for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities." The NRC staff has determined that, in a letter dated May 15, 2012 (ADAMS Accession No. ML12131A043), NEI 12-01 is an acceptable approach to responding to the request for information.

In addition, the NRC staff concludes that the licensee provided an adequate basis for its proposed alternative to responding to the 50.54(f) Request for Information regarding communications and staffing for NTTF Recommendation 9.3.

If you have any questions, please contact me at 301-415-1447 or via e-mail at Farideh.Saba@nrc.gov.

Sincerely,

Farideh E. Saba

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

Docket Nos. 50-325 and 50-324

Enclosure: Staff Evaluation

cc w/encl: Distribution via Listserv

NUCLEAR REGULATORY COMMISSION STAFF EVALUATION

INFORMATION REQUEST MADE UNDER 10 CFR 50.54(f)

REGARDING NEAR-TERM TASK FORCE RECOMMENDATION 9.3

CAROLINA POWER & LIGHT COMPANY

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

DOCKET NOS. 50-325 AND 50-324

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12073A348), the U.S. Nuclear Regulatory Commission (NRC or Commission) issued a Request for Information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) which included the Near-Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness (EP). Specifically, licensees were requested to assess their means to power communications equipment onsite and offsite during a prolonged Station Blackout event and to perform a staffing study to determine the staff required to fill all necessary positions in response to a multi-unit event. If a licensee could not meet the requested 90-day response, then that licensee was required to provide a response within 60 days of the issuance of the letter describing an alternative course of action and estimated completion date.

By letter dated May 3, 2012 (ADAMS Accession No. ML12125A410), the Nuclear Energy Institute (NEI) submitted NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0, May 2012. The NRC staff reviewed NEI 12-01 and found it to be an acceptable method for licensees to use when responding to the NRC's 10 CFR 50.54(f) Request for Information regarding communications and staffing for EP. This staff evaluation is focused specifically on the licensee's response to the 10 CFR 50.54(f) letters and not on the associated Orders.

By letter dated May 9, 2012 (ADAMS Accession No. ML12138A016), Carolina Power & Light Company, (the licensee), submitted its 60-day response to the 10 CFR 50.54(f) Request for Information proposing an alternative course of action based upon the higher priority to complete the implementation of the revised EP Rule. The NRC staff reviewed the licensee's proposed alternative against the guidance contained in NEI 12-01. In addition, the NRC staff considered the direction given by the Commission in the Staff Requirements Memorandum (SRM) to SECY 12-0025, "Proposed Orders and Requests for Information in Response to Lessons Learned from Japan's March 11, 2011, Great Tohoku Earthquake and Tsunami," dated March 9, 2012 (ADAMS Accession No. ML120690347). This SRM stated, in part, that:

> Completing implementation activities associated with the rule we have already promulgated has greater safety significance and also involves the coordinated actions of our partners in State and local governments. Substantial public credibility benefits accrue from continuing these activities as a priority.

The NRC staff considers the existing EP framework and regulations provide reasonable assurance of adequate protection of public health and safety in the event of a radiological emergency. The revised EP rule that was promulgated on November 23, 2011, initiated a number of activities that will enhance EP programs, including conducting a staffing analysis and enhancing public notification systems. The implementation of the EP rule was given priority by the Commission and the NTTF recommendations should not displace ongoing work that has greater safety benefit, higher priority, or is necessary for continued safe operation of nuclear power plants. The NTTF Report concluded that continued operation and continued licensing activities do not pose an imminent risk to the public health and safety and are not inimical to the common defense and security.

The phased approach to responding to the 10 CFR 50.54(f) letters, combined with the definition of new response requirements associated with Fukushima NTTF Recommendation 4.2, as subsequently modified by the NRC staff and issued as NRC Order EA-12-049 (ADAMS Accession No. ML12054A736) will ensure that enhancements will be made to staffing and communications by licensees. It should be noted that the 10 CFR 50.54(f) letter and implementation of the Order includes completion of actions related to response assignments, staffing changes, issuance of new or revised procedures or guidelines, and training. Activities are ongoing by both the NRC and industry to initiate interim actions as a result of lessons learned from the events which will be provided in the 90-day response such as:

- Methods to access the site
- Notification of staff
- Interim actions taken to date

Given the above and that the licensee's approach was found to be consistent with the guidance of NEI 12-01 and the direction of the Commission, the NRC staff concludes that the licensee has provided an adequate basis for its proposed alternative responding to the 10 CFR 50.54(f) letters regarding communications and staffing for Recommendation 9.3.

If you have any questions, please contact me at 301-415-1447 or via e-mail at Farideh.Saba@nrc.gov.

Sincerely,

/RA/

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

Docket Nos. 50-325 and 50-324

Enclosure: Staff Evaluation

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**ADAMS Accession No.:** ML12158A172 * Concurrence via email

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|---|---|---|---|
| NAME | FSaba | BTully | KWilliams* |
| DATE | 6/ 8 /12 | 6/ 8 /12 | 5/ 24 /12 |
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| NAME | RPascarelli | DBroaddus | FSaba |
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