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U. S. Nuclear Regulatory Commission  
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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

**SUBJECT: CAROLINA POWER & LIGHT COMPANY'S AND FLORIDA POWER CORPORATION'S RESPONSE TO THE MARCH 12, 2012, REQUEST FOR INFORMATION, ENCLOSURE 2, RECOMMENDATION 2.1, FLOODING, REQUIRED RESPONSE 1, INTEGRATED ASSESSMENT APPROACH**

**REFERENCES:**

1. NRC Letter, E.J. Leeds (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred status, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident*, dated March 12, 2012, Accession No. ML12053A340
2. NRC Japan Lessons-Learned Project Directorate, JLD-ISG-2012-05, *Guidance for Performing the Integrated Assessment for External Flooding, Interim Staff Guidance, Revision 0*, dated November 30, 2012, Accession No. ML12311A214
3. NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), *Trigger Conditions for Performing an Integrated Assessment and Due Date for Response*, dated December 3, 2012, Accession No. ML12326A912

Ladies and Gentlemen:

On March 12, 2012, the NRC issued Reference 1 to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding. One of the Required Responses in this letter directed licensees to submit an approach for developing an Integrated Assessment Report, including criteria for identifying vulnerabilities, within 60 days after issuance of the NRC's guidance on the subject (i.e., Reference 2). The following is Carolina Power & Light Company's (CP&L) and Florida Power Corporation's (FPC) 60-day response.

On November 30, 2012, the NRC issued the Reference 2 Interim Staff Guidance. CP&L and FPC will adopt the Reference 2 guidance as the approach for developing the NTTF 2.1 Flooding Integrated Assessment Report for those plant sites listed above if the reevaluated flooding hazard is not bounded by the current design basis flood evaluation.

CP&L and FPC also will adopt the guidance of Reference 3 regarding the trigger conditions and scope of any required Integrated Assessment.

This letter contains new Regulatory Commitments as identified in the attachment.

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 the 29<sup>th</sup> day of January, 2013.

Sincerely,



Benjamin C. Waldrep  
Vice President – Corporate Governance &  
Operations Support

Attachment – List of Regulatory Commitments

cc: USNRC Region II, Regional Administrator  
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  
C. Gratton, 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

**List of Regulatory Commitments**

The following table identifies the actions in this document to which Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC) have committed. Statements in this submittal, with the exception of those in the table below, are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Donna Alexander, Manager – Nuclear Regulatory Affairs, at (919) 546-5357.

Commitment	Scheduled Completion Date*
<p><b>Brunswick Steam Electric Plant, Unit Nos. 1 and 2:</b> If an integrated assessment is triggered based on the guidance in the NRC Letter from D. L. Skeen (NRC) to J.E. Pollock (NEI), <i>Trigger Conditions for Performing an Integrated Assessment and Due Date for Response</i>, dated December 3, 2012, Accession No. ML12326A912, CP&amp;L will utilize the guidance contained in JLD-ISG-2012-05, <i>Guidance for Performing the Integrated Assessment for External Flooding, Interim Staff Guidance, Revision 0</i>, dated November 30, 2012, Accession No. ML12311A214, to perform the assessment.</p>	<p>March 12, 2017</p>
<p><b>Crystal River Unit 3 Nuclear Generating Plant:</b> If an integrated assessment is triggered based on the guidance in the NRC Letter from D. L. Skeen (NRC) to J.E. Pollock (NEI), <i>Trigger Conditions for Performing an Integrated Assessment and Due Date for Response</i>, dated December 3, 2012, Accession No. ML12326A912, FPC will utilize the guidance contained in JLD-ISG-2012-05, <i>Guidance for Performing the Integrated Assessment for External Flooding, Interim Staff Guidance, Revision 0</i>, dated November 30, 2012, Accession No. ML12311A214, to perform the assessment.</p>	<p>March 12, 2017</p>
<p><b>Shearon Harris Nuclear Power Plant, Unit No. 1:</b> If an integrated assessment is triggered based on the guidance in the NRC Letter from D. L. Skeen (NRC) to J.E. Pollock (NEI), <i>Trigger Conditions for Performing an Integrated Assessment and Due Date for Response</i>, dated December 3, 2012, Accession No. ML12326A912, CP&amp;L will utilize the guidance contained in JLD-ISG-2012-05, <i>Guidance for Performing the Integrated Assessment for External Flooding, Interim Staff Guidance, Revision 0</i>, dated November 30, 2012, Accession No. ML12311A214, to perform the assessment.</p>	<p>March 12, 2015</p>
<p><b>H. B. Robinson Steam Electric Plant, Unit No. 2:</b> If an integrated assessment is triggered based on the guidance in the NRC Letter from D. L. Skeen (NRC) to J.E. Pollock (NEI), <i>Trigger Conditions for Performing an Integrated Assessment and Due Date for Response</i>, dated December 3, 2012, Accession No. ML12326A912, CP&amp;L will utilize the guidance contained in JLD-ISG-2012-05, <i>Guidance for Performing the Integrated Assessment for External Flooding, Interim Staff Guidance, Revision 0</i>, dated November 30, 2012, Accession No. ML12311A214, to perform the assessment.</p>	<p>March 12, 2016</p>

\* Scheduled completion dates are consistent with the Integrated Assessment completion date as specified in Reference 1 based on the site priorities specified in NRC letter, *Prioritization of Response Due Dates for Request For Information Pursuant to Title 10 of the Code Of Federal Regulations 50.54(f) Regarding Flooding Hazard Reevaluations for Recommendation 2.1 of the Near-Term Task Force Review of Insights From the Fukushima Dai-Ichi Accident*, dated May 11, 2012.