



Carolina Power & Light Company

DEC 22 1992

SERIAL: NLS-92-300
10 CFR 50.55a

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20545

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
INSERVICE INSPECTION PROGRAM
USE OF ASME SECTION XI CODE CASE N-498 IN CURRENT TEN-YEAR INTERVAL PROGRAM

Gentlemen:

Carolina Power & Light Company's (CP&L) Brunswick Steam Electric Plant, Unit Nos. 1 and 2, are in the second period of their respective ten-year inservice inspection (ISI) interval. The inspection program for these units is conducted in accordance with the requirements of ASME Code Section XI, 1980 Edition, Winter 1981 Addendum, as described in Revision 1 of the Brunswick ISI Program Plan, dated August 19, 1987 (NLS-87-159). ASME Section XI, Table IWB-2500-1, Category B-P and Table IWC-2500-1, Category C-H require hydrostatic tests be performed once during the ten-year interval, at or near the end of the interval. Code Case N-498, which delineates alternatives to the performance of these hydrostatic tests, was recently included in Revision 9 to Regulatory Guide 1.147 (dated April 1992), "Inservice Inspection Code Case Acceptability - ASME Section XI Division I." The purpose of this letter is to inform the NRC of our intent to use Code Case N-498 as an alternative to the requirements of ASME Section XI during the current ten-year ISI inspection interval.

Code Case N-498 permits an alternative to hydrostatic testing which provides an acceptable level of quality and safety for Class 1 and 2 systems, as well as significantly reducing personnel exposure and outage time associated with performance of the testing. Carolina Power & Light Company is adding Code Case N-498 to the list of code cases which will be used at the Brunswick Plant during the second inspection interval, as shown in Section 6.0 of Revision 1 to the Inservice Inspection Program contained in the August 19, 1987 submittal (Attachment 5).

Please refer any questions regarding this submittal to Mr. D. E. Waters at (919) 546-3678.

Yours very truly,

D. C. McCarthy
Manager
Nuclear Licensing Section

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