

Carolina Power & Light Company
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J.S. Keenan
Vice President
Brunswick Nuclear Plant

OCT 27 1998

10 CFR 50.54(f)

SERIAL: BSEP 98-0161

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
GENERIC LETTER 96-05, "PERIODIC VERIFICATION OF DESIGN-BASIS CAPABILITY
OF SAFETY-RELATED MOTOR-OPERATED VALVES" COMMITMENT TO TOPICAL
REPORT NEDC-32719, REVISION 2

Gentlemen:

On October 30, 1997, the NRC issued "Safety Evaluation on Joint Owners' Group Program on Periodic Verification of Motor-Operated Valves Described in Topical Report NEDC-32719, (Revision 2)," which states that the NRC considers the Joint Owners' Group (JOG) Program on Motor-Operated Valve (MOV) Periodic Verification to be an acceptable industry-wide response to Generic Letter (GL) 96-05, within the conditions and limitations described in the Safety Evaluation (SE).

The JOG agreed that after the issuance of the SE, requests would be made for participating utilities to notify the NRC of their plans to implement the JOG program described in Topical Report NEDC-32719 (Revision 2), "MPR Report-1807, Revision 2, Joint Owners' Group Program on Motor-Operated Valve (MOV) Periodic Verification," which was the subject of the SE, and that any deviations would be justified. This letter, provides Carolina Power and Light (CP&L) Company's Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2 response.

In a letter dated March 17, 1997 (Serial: BSEP 97-0072), CP&L committed to implement an MOV periodic verification program as a participant in the JOG test program that is in accordance with the actions delineated in Generic Letter 96-05. CP&L, as a participant in the JOG Program on MOV Periodic Verification, will implement the program elements described in Topical Report NEDC-32719, Revision 2, at BSEP with the exception noted below.

CP&L plans to deviate from the JOG program regarding the interim static test frequency criteria described in Section 4 of the topical report. CP&L will continue to perform static testing in accordance with the original GL 89-10, "Safety-Related Motor-Operated Valve Testing and

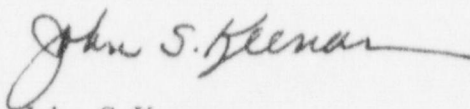
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Surveillance," commitment to periodically static test the program MOVs on a frequency of every three refueling outages or five years, until after completion of the BSEP Spring 1999, Unit No. 2 refueling outage (i.e., B214R1). CP&L will then begin implementation of the static testing approach described in Topical Report NEDC-32719, Revision 2, for both units.

This letter supersedes prior communications regarding periodic verification testing commitments for either GL 96-05 or GL 89-10. Please refer any questions regarding this submittal to Mr. Keith R. Jury, Manager - Regulatory Affairs, at (910) 457-2783.

Sincerely,

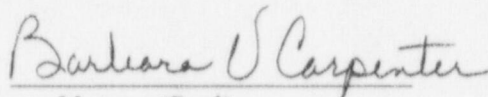


John. S. Keenan

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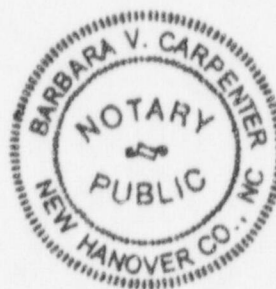
Enclosure: List of Regulatory Commitments

John S. Keenan, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, and agents of CP&L Company.



Notary (Seal)

My commission expires: 2-16-03



cc (with enclosure):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Luis A. Reyes, Regional Administrator
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303

U. S. Nuclear Regulatory Commission
ATTN: Mr. Charles A. Patterson, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission
ATTN: Mr. David C. Trimble, Jr. (Mail Stop OWFN 14H22)
11555 Rockville Pike
Rockville, MD 20852-2738

Ms. Jo A. Sanford
Chair - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
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LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Carolina Power & Light (CP&L) Company in this document. Any other actions discussed in the submittal represent intended or planned actions by CP&L. They are described for the NRC's information and are not regulatory commitments. Please notify the Manager - Regulatory Affairs at the Brunswick Steam Electric Plant (BSEP) of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
CP&L, as a participant in the Joint Owners' Group Program on Motor-Operated Valve (MOV) Periodic Verification, will implement the program elements described in Topical Report NEDC-32719, Revision 2, at the BSEP with the exception noted below.	N/A
CP&L will begin implementation of the static testing approach described in Topical Report NEDC-32719, Revision 2, for both units at BSEP after the Spring, 1999, Unit No. 2, refueling outage (i.e., B214R1).	Following completion of B214R1